

# Milestone Report

## for Upland Source Control at the Portland Harbor Superfund Site

March 2006

Prepared by the Oregon Department of Environmental Quality  
as required by the 2005 Portland Harbor Joint Source Control Strategy



This document is posted on DEQ's web page at <http://www.deq.state.or.us/nwr/PortlandHarbor/JSCS.htm>.



# Table of Contents

1.0 Introduction .....	1
1.1 Organization of the Milestone Report.....	1
2.0 Identifying Potential Sources of Contamination in Portland Harbor .....	2
2.1 DEQ Site Discovery and Site Assessment work prior to the December 2000 listing ....	3
2.2 DEQ Site Discovery and Site Assessment work following the December 2000 listing ...	5
3.0 Evaluating Potential Sources of Contamination to the River .....	5
4.0 Taking Measures to Control Sources and Making Source Control Decisions....	6
4.1 Types of source control measures.....	7
4.2 DEQ coordination with EPA and partners on source control decisions .....	8
4.3 Public Involvement in source control decisions .....	8
5.0 Status of Ongoing and Completed Source Control Measures .....	9
6.0 Issues Encountered in Source Control Work .....	9
7.0 Summary .....	11
8.0 Obtaining Additional Information on Upland Source Control Work .....	12
9.0 Information about Table 4: <i>Controlling Confirmed or Suspected</i> <i>Upland Sources of Contamination to Portland Harbor</i> .....	13
9.1 Acronyms and abbreviations.....	16
9.2 Contact information for DEQ Project Managers.....	17

## List of Tables

- Table 1. Results of 1999 DEQ Project Manager evaluation of the potential relationship between in-water sediment contamination and upland sites already in the process of cleanup (from 1999 data)
- Table 2. Sites identified by DEQ in 1999 as part of the Portland Harbor Site Discovery Process (from 1999 data)
- Table 3. New Sites in Portland Harbor identified through the Site Discovery Process (2000 to present)
- Table 4. Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

## 1.0 Introduction

On December 1, 2000, a section of the lower Willamette River within the City of Portland, the Portland Harbor, was added to the Superfund National Priority List (NPL). In February 2001, the Oregon Department of Environmental Quality (DEQ), United States Environmental Protection Agency (EPA), and other governmental parties<sup>1</sup> signed a Memorandum of Understanding (MOU) that provided a framework for cooperation in the investigation and cleanup of the Portland Harbor Superfund Site to optimize federal, state, tribal and trustee expertise and available resources.

Under the 2001 MOU, EPA was designated as the lead agency for investigating and cleaning up “in-water” contamination in the Harbor, or contamination in the river water and underlying sediment, using federal Superfund authorities. DEQ, using state cleanup authority, was designated as the lead agency for identifying and controlling “upland” sources of contamination, or those sources of pollution adjacent to or near the river that may be contaminating river water or sediments. To coordinate in-water cleanup and upland source control work, the MOU specifies that DEQ and EPA will jointly develop a source control strategy that defines a process for identifying and controlling potential sources of contamination threatening the river.

DEQ and EPA finalized the Portland Harbor Joint Source Control Strategy (JSCS) in December 2005<sup>2</sup>. The overarching goal of the JSCS is to identify, evaluate and control sources of contamination that may affect the Willamette River in a manner that is consistent with the objectives and schedule for the Portland Harbor remedial investigation and feasibility study (RI/FS). Timely upland source control is necessary to allow cleanup of the river to proceed without risk of significant recontamination.

The JSCS requires DEQ to prepare a Milestone Report on a quarterly basis that summarizes the status of DEQ’s upland source control work. This is the first Milestone Report. Milestone Reports are submitted to EPA, and provide the basis for quarterly meetings with EPA and our government partners to discuss site prioritization and source control progress. These reports also serve as documentation of progress on river-wide source control within Portland Harbor.

### 1.1 Organization of the Milestone Report

The Milestone Report is organized as follows.

- Section 2.0: Identifying Potential Sources of Contamination in Portland Harbor – This section provides the history of DEQ’s work to identify potential sources of contamination to the Willamette River in Portland Harbor, including site discovery and site assessment

---

<sup>1</sup> The signatory partners to the MOU include the EPA, DEQ, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Siletz Indians, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Nez Perce Tribe, National Oceanic and Atmospheric Administration, Oregon Department of Fish and Wildlife, and U.S. Department of the Interior.

<sup>2</sup> The JSCS is available on DEQ’s web site at <http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm>; click “Joint Source Control Strategy” on the left side bar.

activities before and after the December 2000 Superfund listing. Tables 1, 2 and 3 provide additional information on site discovery and site assessment work.

- Section 3.0: Evaluating Potential Sources of Contamination to the River – This section describes DEQ's source control evaluation work for all confirmed or suspected upland sources of contamination to Portland Harbor, as summarized in Table 4.
- Section 4.0: Taking Measures to Control Sources and Making Source Control Decisions – This section describes the source control measures used at upland sites in Portland Harbor and the process for making source control decisions, including coordination with EPA and our government partners, and public involvement opportunities. Source control measures and decisions are summarized in Table 4.
- Section 5.0: Status of Ongoing and Completed Source Control Measures – This section describes the information presented in Table 4 that summarizes the status of ongoing and completed source control measures.
- Section 6.0: Issues Encountered in Source Control Work – This section describes issues affecting DEQ's ability to conduct source control work and proposes ways to resolve issues as well as a desired timeframe for resolution.
- Section 7.0: Summary – This section summarizes the overall status of source control work in Portland Harbor, highlighting accomplishments, key issues and next steps for moving forward.
- Section 8.0: Obtaining Additional Information on Upland Source Control Work – This section indicates where additional information can be found on the status of source control work at upland sites in Portland Harbor.
- Section 9.0: Information on Table 4, *Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor*: This section provides helpful information for interpreting Table 4, including definition of key terms and acronyms used.

## 2.0 Identifying Potential Sources of Contamination in Portland Harbor

In 1997, DEQ asked EPA for assistance in identifying potential sources of elevated chemical concentrations detected at sites within Portland Harbor. The result of this request was a sediment investigation that covered six miles of Portland Harbor (now known as the Initial Study Area, or ISA<sup>3</sup>) considered likely to have the highest chemical concentrations based on the presence of a number of industrial sources. The findings of this study, documented in EPA's 1998 "Portland Harbor Sediment Investigation Report," suggested that there were several areas of elevated chemical concentrations in river sediments within the Harbor. Because of these findings, DEQ initiated a proactive site discovery process that included evaluation of available information on the activities and conditions in Portland Harbor to identify likely sources of upland contamination threatening the river.

---

<sup>3</sup> The ISA was a six mile stretch of the lower Willamette River, extending from the southern tip of Sauvie Island upstream to Swan Island.

EPA's 1998 "Portland Harbor Sediment Investigation Report" found that most of the areas of elevated chemical concentrations in river sediments were near known sources of upland pollution. There were some sediment areas with high chemical concentrations, however, that were not near known or identified upland sources. In addition, it appeared that contaminant migration and resuspension were limited within the Harbor, suggesting the existence of additional unidentified upland sources. These findings formed the basis of DEQ's site discovery efforts in Portland Harbor.

## **2.1 DEQ Site Discovery and Site Assessment work prior to the December 2000 listing**

In 1998 and 1999, DEQ followed eight initial steps in searching for additional sources of upland contamination in Portland Harbor (site discovery) and assessing potential sources to determine the need for source control actions (site assessment). These eight steps are described in detail in DEQ's June 1999 "Portland Harbor Sediment Management Plan" and are summarized below.

Step 1: Identifying contaminants of interest – DEQ used the "Portland Harbor Sediment Investigation Report" results to identify a representative list of contaminants of interest (COI) – chemicals present in the Harbor at levels that could threaten human health and the environment. The COIs included metals, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), chlorinated pesticides, chlorinated herbicides, dioxin and tributyl tin (TBT).

Step 2: Identifying elevated concentrations – DEQ developed a method for determining what concentrations constituted "elevated" COI levels within the Harbor. Because there was no clear definition of background contaminant concentrations or ambient conditions in the Portland Harbor area, sediment data from the Harbor were evaluated with a graphical method previously used by the U.S. Geological Survey Water Resources Division to define apparent elevated contaminant levels.<sup>4</sup> "Baseline" contaminant concentrations were developed for Portland Harbor sediment from this graphical evaluation method.

Step 3: Identifying locations where baseline concentrations are exceeded – Maps were prepared to show the locations of samples with elevated concentrations of COIs throughout the Harbor. DEQ project managers working on active cleanup sites in the Harbor reviewed these maps and provided feedback on whether the elevated concentrations found in sediment appeared to be related to sources on sites that DEQ was actively working to investigate or clean up, or whether the maps indicated the potential presence of another source. Table 1 provides a list of sites in Portland Harbor that DEQ was actively working on in 1999, along with a summary of DEQ project managers' evaluation of the potential relationship between in-water sediment COI levels and contamination at these active cleanup sites.

Step 4: Identifying potential sources – DEQ then began to identify other potential sources of contamination in the general vicinity of Portland Harbor. These site discovery efforts targeted areas of elevated sediment contamination either unrelated to sites that DEQ was already investigating or cleaning up, or areas adjacent to active cleanup sites for which site data suggested the potential presence of another source.

---

<sup>4</sup> The method was described by Frank Rinella, a Water Quality specialist with USGS Water Resources Division, at a Contaminated Sediments Conference sponsored by The Environmental Law Education Center, January 30, 1998.

Site discovery work included researching information on each area of elevated COIs to identify potential upland sources for the sediment contamination, analyzing area and site drainage patterns, evaluating historic activities and conducting field reconnaissance work. Upland properties that were found to be associated with the sediment contamination were then prioritized based on sediment contamination levels, the number of COIs present in the sediment, the toxicity of the contaminant to people and the environment (using EPA's water quality ranking) and professional judgment.

Step 5: Requesting information from property owners – In January 1999, DEQ sent letters to all owners of property (approximately 90 parties) located within 1,500 feet of Portland Harbor to provide information on DEQ's site discovery efforts and to request additional information. These "potentially responsible parties" were asked to provide historic and current information about activities at the site to assist DEQ's site discovery process. Follow-up letters and questionnaires were sent to a subset of the property owners, and when appropriate, to site lessees that were potentially responsible for sources of sediment contamination in the Harbor. Site discovery questionnaires were sent to the property owners listed in Table 2.

Step 6: Documenting likely sources of contamination – Potential likely sources of contamination were identified for each of the sediment areas that had COI contamination above baseline levels, and available records for these sources were documented. Forty-four likely potential sources were identified through the process described above (Table 2). A file was then created in DEQ's Environmental Cleanup Site Information (ECSI) database for each potential source to complete the site discovery process for the Portland Harbor area. DEQ then initiated the site assessment process, the next phase of site evaluation.

Step 7: Site screening and prioritization – In the first phase of site assessment, sediment samples were correlated with presumed upland sources (listed in Table 2) for the purposes of preliminary site screening. The highest priority sources were those associated with sediment contaminant concentrations reflecting the top five percentile of chemical concentrations for a particular chemical. Priority was given to those sites where associated sediment concentrations were more than three times the baseline level or where baseline concentrations were exceeded for several different contaminants. Consideration was also given to the toxicity of the chemicals found to be elevated using EPA's water quality rankings. Lower priority was given to upland sites associated with only a small subset of COIs that exceed baseline levels and where the magnitude of the exceedance was less than a factor of three for all constituents. Professional judgment was also used to integrate other factors pertinent to the priority for follow-up. These factors included: evidence of an on-going release, observations made during field reconnaissance, concentration elevations that suggested a release but were below baseline levels, historic information that suggested a release not associated with a particular baseline exceedance, the quality of information linking a potential source to the elevated concentrations, the presence of other metals not considered of primary concern (e.g., iron, magnesium, thallium, cobalt, vanadium, and titanium), and an evaluation of the individual compounds within some of the other contaminant groups (e.g., individual PAHs or phthalates).

Step 8: Strategy recommendations – DEQ then developed recommendations for further investigation and/or cleanup for a number of high priority sources. These “strategy recommendations” summarized available information on the potential sources and potential threats posed by the sources, and recommended investigation/cleanup actions and priority levels for the work. All available information on file and any information received through questionnaires was reviewed in detail to develop the recommendations. Where historical site data was lacking, a review of Sanborne Insurance Maps was often completed.

DEQ’s initial effort of completing strategy recommendations for all likely Portland Harbor sources was curtailed with EPA’s December 2000 listing of the Harbor.

## **2.2 DEQ Site Discovery and Site Assessment work following the December 2000 listing**

At the time of the Portland Harbor listing (December 2000), DEQ was working to investigate and/or clean up 16 sites in the Portland Harbor area (listed in Table 1). By the time of the listing, DEQ had identified an additional 44 upland sites through the site discovery process were potential or confirmed sources of contamination to the river in the Harbor (listed in Table 2).

DEQ’s site discovery and site assessment efforts continued after EPA’s December 2000 listing of Portland Harbor, and for the most part, these efforts followed the same process used prior to the listing. DEQ’s work continued to focus on facilities along the banks of the Willamette River within the bounds of the 1997 Portland Harbor sediment investigation.

As the Portland Harbor study area began to grow beyond the Initial Study Area, DEQ’s site discovery and site assessment efforts expanded with it. Recently, much of DEQ’s site discovery and site assessment work has focused on identifying potential sources of contamination threatening the river through stormwater that is piped to the river from surrounding upland areas. DEQ has worked closely with the City of Portland to identify upland sources contributing contamination via the City’s municipal stormwater system. Since the Portland Harbor Superfund listing in 2000, DEQ has identified an additional 19 sites adjacent to or near Portland Harbor through the site discovery process (Table 3).

## **3.0 Evaluating Potential Sources of Contamination to the River**

DEQ is now investigating or directing source control work at nearly 60 upland sites in Portland Harbor. Preliminary investigation activities at these sites are designed to determine whether the site is a potential or ongoing source of contamination to the river. These investigations, or “source control evaluations,” consider all potential, current and historic contaminant sources and pathways for the contaminants to migrate to the river. Potential pathways include:

- Direct discharges – Pollutants from commercial, industrial, private or municipal outfalls are being discharged directly to the Portland Harbor Superfund Site. Many of these discharges are permitted under the Clean Water Act National Pollutant Discharge Elimination System.

(NPDES). Permitted discharges<sup>5</sup> include industrial wastes, storm water runoff, and combined sewer overflows (CSOs).

- Groundwater – Contaminated groundwater may enter the river directly via discharge through sediments, bank seeps, or it may infiltrate into storm drains/pipes, ditches or creeks that discharge to the river. Contaminant migration may occur as non-aqueous phase liquids (NAPLs) or as chemicals dissolved in the groundwater itself.
- Stormwater – Contaminants may be carried to the river by water that runs off a site into storm drains after it rains, delivered to the river by stormwater pipes (including permitted and unpermitted stormwater discharges).
- Overland transport/sheet flow – The uncontrolled flow of water from a site to the river and the transport of other materials from a site may deliver contaminants to the river.
- Bank erosion/leaching – River bank soil, contaminated fill, waste piles, landfills and surface impoundments may release contaminants directly to the river through erosion, via soil erosion to storm water, or by leaching to groundwater.
- Overwater activities – Contaminants from overwater activities (e.g., sandblasting, painting, unloading, maintenance, repair and operations) at riverside docks, wharves, or piers; discharges from vessels (e.g., gray, bulge, ballast waters); full releases; and spills may affect the river.

These potential contaminant migration pathways are evaluated for each site, and sites that are identified as current or potential sources of pollution to the river are characterized and prioritized. Source control measures are then initiated, or further evaluation of source control alternatives is conducted to determine whether source control measures are required.

Table 4 provides a summary of confirmed and suspected upland sources of contamination to the river that DEQ is either actively working on or has finished source control work on by issuing a final source control decision. Table 4 also provides the basis for the determination that a site is a source of contamination to the river, the status of and schedule for source control evaluation, and the priority of the site for source control. The table includes the priority of each contaminant migration pathway for each site, as well as the overall priority of the site based on the pathway priorities.

High priority sites are identified in the table based on existing site information, and subsequent Milestone Reports will identify any new high priority sites as new information becomes available. Source control is expected to move forward at high priority sites without delay.

#### **4.0 Taking Measures to Control Sources and Making Source Control Decisions**

DEQ determines the need for source control measures at each upland site, in consultation with EPA, based on the completeness of contaminant migration pathways, exceedances of Screening

---

<sup>5</sup> CSO events are untreated discharges of combined storm water, sanitary sewage from residential, commercial, and industrial sources that overflow from the sewer system into the river during heavy rainfall periods when the amount of storm water and sewage exceeds the capacity of the collection system.



Level Values (SLVs), and other factors as appropriate. See p. 3-1 through 3-6 of the JSCS for more information about SVLs, and p. 4-1 through 4-8 of the JSCS for more information about the source control decision process.

#### **4.1 Types of source control measures**

Upland source control is an iterative process, where early steps may be revisited and conclusions refined by information gathered later in the process. A combination of tools may be used to control a source, including but not limited to the following.

- Technical assistance – Technical assistance, often provided during inspections, provides technical information designed to help individual businesses bring their facilities into compliance with environmental regulations. DEQ's Hazardous Waste Program is actively providing technical assistance to facilities within the Portland Harbor Superfund Site area.
- Cleaning up contaminated upland areas – Cleanup work addresses contaminated soil, groundwater, stormwater and other sources and focuses on reducing or eliminating contaminant migration to the river. Common source control measures include removing highly contaminated soil areas, stabilizing or capping contaminated bank areas, treating or containing contaminated groundwater, and extracting contaminated sediment from storm sewer systems. Source control measures vary from site to site.
- Source control of active discharges – Tools to control active discharges include best management practices, industrial process changes, pollution prevention practices, and technology-based effluent controls. Compliance is achieved voluntarily or through administrative actions, including permits or enforcement.
- Source control of storm water – Storm water source control is complex because storm drain systems capture discharges from many different sources (e.g., land use activities, runoff from contaminated sites, and infiltration of contaminated groundwater into the storm drain system). It is also complex because storm water regulation may involve federal, state and local agencies. Because of this complexity, all of the tools described above are useful for storm water source control and will be used as appropriate.
- Administrative actions and enforcement – Administrative actions include licenses, permits, deed restrictions, requirements for site development plans, and enforcement actions, which may be necessary when administrative actions are violated. Agencies rarely take enforcement actions without first conducting an inspection and documenting findings, requested changes, warnings and offers of technical assistance. When enforcement actions are warranted, they are usually taken in escalating order, starting with notices of violation, moving to enforcement or compliance orders requiring specific changes by a set date, and ending in monetary penalties. Formal cleanup actions performed under an order or decree use oversight and enforcement to ensure that appropriate actions are taken in a timely manner.

Table 4 summarizes source control decisions conducted at upland sites, the basis for the determination that upland source control measures are necessary, a summary of the selected source control measure(s), and a schedule for implementing the source control measure(s).

#### **4.2 DEQ coordination with EPA and partners on source control decisions**

As the lead agency for identifying and controlling sources of upland contamination threatening the river in Portland Harbor, DEQ coordinates with EPA and our government partners on source control work. This includes documenting, tracking and coordinating source control efforts as described in Sections 2.5 and 7 of the JSCS.

DEQ will provide EPA and our partners with an opportunity to review source control decisions prior to being finalized. These decisions typically fall into the following three categories.

- DEQ has determined that a site is not a current or future source of contaminants to Portland Harbor and that no source control measures are required.
- DEQ has selected the source control measures for a site.
- DEQ has concluded that source control at a site is complete, or in the case of systems that require operation and maintenance (e.g., hydraulic containment), that the source control action is effective.

DEQ will inform EPA and our partners of pending source control decisions and the schedule for review, and will provide copies of source control decision documentation to EPA and partners upon request. EPA and partners will have 30 days to provide comments to DEQ on source control decisions.

In addition to this regular review and comment process, some upland sites in Portland Harbor may warrant closer coordination between DEQ, EPA and our partners for source control (e.g., the Gasco site and potential source control measures for the chlorinated solvent groundwater plume at the Siltronic site). In these instances, DEQ and EPA source control coordinators will develop a project-specific coordination strategy.

#### **4.3 Public involvement in source control decisions**

DEQ Cleanup Program statutes and rules require that a public notice and comment opportunity be provided prior to DEQ's selection of a final site cleanup remedy and before DEQ determines that the cleanup is complete. For upland Portland Harbor cleanup projects, this means that DEQ issues a public notice and seeks public comments on the recommended final site cleanup strategy. Once public input is considered, DEQ's final decision is documented in a Record of Decision (ROD) for the site. For most sites, the upland DEQ ROD includes elements that address both source control for Portland Harbor and cleanup actions specific to areas of upland contamination that are not related to pollution in the Harbor.

Many of the source control measures implemented at upland sites are conducted prior to the selection of the final upland site remedy. While public notice and comment is not required for these "interim" remedial actions under DEQ statutes and rules, DEQ typically does issue a public notice and seek public comments when the action is likely to be a substantive piece of the final site remedy, or as the DEQ project manager determines is appropriate.

DEQ does not typically seek public comments for small-scale interim source control measures and time critical actions. Project managers will, however, issue notices as appropriate to let the public know that the activity is being conducted.

## 5.0 Status of Ongoing and Completed Source Control Measures

Table 4 summarizes the status of ongoing source control measures (SCMs), including SCM activities completed to date, proposed SCM activities, and a target schedule for completion. To the extent practicable, DEQ has collected information and/or made estimates of the mass or volume of contaminants removed, contained, treated or otherwise controlled, to help demonstrate the progress of source control activities. This initial Milestone Report includes only limited information on the mass or volume of contaminants controlled; subsequent Milestone Reports will include more information.

Table 4 also summarizes completed SCMs and provides the date that the SCM was completed, the date of EPA review and comment, and any operation and maintenance requirements associated with the SCM.

## 6.0 Issues Encountered in Source Control Work

This section summarizes issues affecting DEQ's ability to make source control decisions or completeness of determinations for any step of the source control process. This section also presents DEQ's proposed ways to resolve the issues and a desired timeframe for resolution. Six issues have been identified in this initial Milestone Report.

### Issue 1: Moving certain projects through the source control process

For a number of different reasons, certain DEQ Portland Harbor cleanup projects are not proceeding through the source control process at an acceptable pace. Source control activities at the sites need to be accelerated in order to identify, evaluate and control upland contaminant sources before the Portland Harbor Record of Decision.

To resolve this issue, DEQ proposes to first identify these sites and then accelerate their schedules for source control work. Sites that need to be accelerated include:

- Premier Edible Oil SC [Time Oil neighbor - finger pointing] <sup>need</sup> transition zone water sampling
  - Crawford Street black sand in bank [earthy removal done in bank]
  - Georgia Pacific Linnton, OR
  - Schnitzer Burgard need more oversight by DEQ
  - MarCom South bankruptcy → new owner RI/FS work plan in place
  - GS Roofing unpermitted indust. landfill
- Fred Divine? - high phthalates in SW; won't sign agreement

DEQ will report on efforts to accelerate source control work at these sites in the next Milestone Report (June 2006).

Why these?  
↓  
Recalcitrants?

*Why separate from Issue #1?*

Issue 2: Completing source control at the Gasco site

NW Natural's Gasco site is a high priority site for upland source control. The distribution and magnitude of upland contamination at the Gasco site are extensive and very significant. DEQ has directed NW Natural to collect data to support the selection, design, installation and operation of source control measures, rather than conducting further source control evaluation. NW Natural is moving forward with this data collection work, but with the amount of work necessary, DEQ needs to press NW Natural with an aggressive schedule.

DEQ recently assigned Project Manager Heidi Blischke to direct source control work at the Gasco site. Heidi has the experience and the time to manage the project on an aggressive schedule. DEQ is also currently negotiating an amended agreement with NW Natural that will increase DEQ's ability to require compliance with an aggressive schedule.

Issue 3: DEQ staff resource limitations

Limited staff resources are affecting DEQ's ability to conduct and complete source control work in Portland Harbor. The size of DEQ's Cleanup Program was recently reduced due to budget constraints, and with that reduction, DEQ lost several staff working on Portland Harbor. It is unlikely that DEQ's Portland Harbor staffing levels will be increased in the near future.

DEQ is continually looking at staff work load and developing priorities to address the most important work. DEQ will continue Portland Harbor source control efforts focusing on the most significant and potentially significant upland sources, and explore opportunities to increase staffing levels when possible.

Issue 4: Storm water investigations and site discovery efforts

The City of Portland is investigating contamination and source control options (i.e., conducting a remedial investigation and feasibility study) for the City's municipal storm water conveyance system in Portland Harbor under DEQ oversight. The purpose of the work is to determine whether discharges from the City's outfalls are a significant source of Portland Harbor sediment contamination. DEQ is working closely with the City to identify upland sites that may be contributing contamination to the storm water outfalls. A number of new upland sites may be identified in this process, and limited staff resources may affect DEQ's ability to evaluate these new sites.

DEQ will continue to prioritize source control work based on the most significant and potentially significant sources, including upland sites contributing storm water to the City's conveyance system.

Issue 5: Storm water evaluation and control

Storm water has been the most challenging Portland Harbor contaminant migration pathway for DEQ to evaluate and control because of the many sources contributing to storm water systems, the temporal variation in storm water and the complexity of storm water regulation. For these reasons, storm water evaluation and control has generally lagged behind other contaminant migration pathways (i.e., soil and groundwater pathways) in Portland Harbor source control efforts.

DEQ sees resolution of this issue through a number of elements. First, with the December 2005 finalization of the JSCS (and JSCS Appendix D, "*Framework for Portland Harbor Storm Water Screening Evaluations*"), DEQ project managers now have tools to better evaluate Portland Harbor storm water. Second, DEQ recently appointed Karen Tarnow as the Portland Harbor Storm Water Coordinator. This City of Portland, Bureau of Environmental Services-funded position was created to provide programmatic regulatory and site-specific assistance to sites that discharge storm water to the Harbor. Karen will assist DEQ project managers with Portland Harbor storm water issues and help advance the storm water evaluation and control process. Third, DEQ's Portland Harbor Manager and Project Coordinators will work with project managers to address the storm water pathway in a timely manner.

#### Issue 6: Developing a long-term storm water solution

A long-term solution is needed to control contaminants in storm water discharges to Portland Harbor to ensure that ongoing storm water discharges do not recontaminate in-water cleanup remedies.

Resolving this issue will take time. In 2005, DEQ formed a Portland Harbor Storm Water work group composed of staff and managers from DEQ's Cleanup and Water Quality Programs. The purpose of the work group is to address the issue – to develop a regulatory method of ensuring that storm water will not recontaminate sediments after the remedy for Portland Harbor has been implemented. The work group will continue to meet and attempt to develop a long-term storm water solution for Portland Harbor.

## **7.0 Summary**

DEQ is making significant progress in controlling sources of contamination to the lower Willamette River in Portland Harbor, and is coordinating resources of its Cleanup, Hazardous and Solid Waste, Water Quality and Spills Programs to achieve upland source control objectives by the expected time of the Portland Harbor Record of Decision. To date, DEQ has identified approximately 80 upland sites that may be potential sources of contaminants in Portland Harbor, and these sites have been prioritized for additional investigation or source control.

Currently, DEQ is actively overseeing investigation and source control work at over 60 upland sites (summarized in Table 4). Of these 60 sites:

- DEQ has determined that 16 sites are considered to be a high priority for source control. Seven of these high priority sites have active or operating source control measures in place.
- The priority level for 33 sites has not yet been determined. Source control evaluations, which will determine the priority for source control, are scheduled to be complete for 25 of these 33 sites in 2006.
- DEQ has determined that source control work is complete, through closing and/or issuing "No Further Action" determinations, at 14 upland sites (see shaded sites in Table 4).

In addition, the DEQ Toxic Use/Waste Reduction Assistance Program (TU/WRAP) is providing technical assistance to facilities in the Portland Harbor area that may be discharging contaminants to the river via the City's storm sewer system, encouraging these facilities to reduce their hazardous waste use and pollution releases. DEQ TU/WRAP staff worked with the

City of Portland to identify priority areas and facilities, and conducted over 70 technical assistance visits and facility inspections within City outfall basins M-1, 18, 24 and 52. DEQ and the City are currently evaluating the next City outfall basins to focus on in technical assistance and inspection efforts.

DEQ will submit a Milestone Report to EPA each quarter, and update Table 4 with the current status of source control work at all upland sites. For more information about the Milestone Report or DEQ's source control work generally, please contact Jim Anderson, DEQ Portland Harbor Project Manager, at (503) 229-6825, or [anderson.jim@deq.state.or.us](mailto:anderson.jim@deq.state.or.us).

## **8.0 Obtaining Additional Information on Upland Source Control Work**

For more information on DEQ's source control work at any of the sites listed in Table 4, see DEQ's Portland Harbor web page (<http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm>) and click on "Map of Sites" on the left side bar. This link provides a map showing all Portland Harbor upland sites and summary reports of the status of source control work. Just open the map and click on the site you are interested in to connect to DEQ's Environmental Cleanup Site Information (ESCI) database, which houses current information on work at each site.

Alternatively, contact the DEQ project manager (PM) that is leading work on the site you are interested in. Contact information for each DEQ PM is listed on the last page of this report.

For more information on the status work on the Portland Harbor Superfund Site, see EPA's Portland Harbor web page (<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>).

## 9.0 Information about Table 4: Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

The purpose of Table 4, entitled *Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor*, is to track and share information on the status of DEQ's efforts to evaluate and control sources of pollution to the Willamette River in Portland Harbor. The table provides information on each upland site that DEQ is working on in the Harbor, including the status of evaluations to determine whether source control is needed, the progress of source control measures, and the status of source control decisions and EPA review. Below is some helpful information for interpreting the table, including definitions for key terms and acronyms used.

### Site Information and Project Status

The first columns of Table 4 provide basic background information on each site, including:

- the name of the site,
- the site's reference number for DEQ's Environmental Cleanup Site Information (ESCI) database,
- the location of the site (river mile and address),
- the DEQ project manager (PM) that is leading source control work,
- the type of agreement DEQ is using to direct cleanup activities at the site (i.e., Intergovernmental Agreement, Portland Harbor Agreement, Unilateral Order, etc.), and
- the status of work occurring at the site (i.e., Preliminary Assessment, Remedial Investigation, completed Source Control Decision, Remedial Design/Remedial Action, etc.).

### Source Control Evaluation

The Source Control Evaluation (SCE) columns in Table 4 provide information on the status of DEQ's work to evaluate the need for source control measures, including the status of SCE for each potential pathway, the schedule for completing SCE, the basis for determining whether source control measures are needed, and the status of EPA review.

#### Potential pathways

Six standard pathways represent the major potential pathways that contaminants could follow to reach the river from an upland site. These pathways include:

- overland transport/sheet flow – the uncontrolled flow of water and other material to the river from a site
- back erosion – erosion of material within the sloping bank areas of the site to the river
- groundwater – groundwater plumes or discharges to the river via seeps or through preferential pathways
- stormwater – stormwater discharges to the river that originate from a pipe or stormwater system, including unpermitted stormwater discharges and discharges under a DEQ general stormwater permit
- overwater activities – the storage or use of hazardous substances over the water (i.e., storage tanks on docks, permanent work activities conducted over water), that if released would be a

potential current or future source of contamination to the river; pipelines and other conveyance systems are not considered in this category, releases from these types of systems are reported to the Oregon Emergency Response System (OERS) system for clean up

- other – may include permitted wastewater discharges, individually permitted stormwater discharges, air deposition or other pathways

Each of these standard pathways appears for each site in Table 4 to track SCE work on a pathway-specific basis.

#### Use of “N/A” for the pathways

N/A is used in Table 4 to indicate that the particular pathway does not exist at the site. For example, for an upland site that is set back from the river (i.e., not adjacent to the river’s edge)

N/A would indicate that the *overland transport/sheet flow*, *overwater activities*, and *bank erosion* pathways do not exist at the site. For a site that is adjacent to the river, but where a concrete seawall lines the river bank, N/A would indicate that the pathway *bank erosion* does not exist at the site.

#### Priority levels for each pathway and site

Each pathway evaluated at each site is given a priority level for source control upon completion of the SCE, or when adequate information exists to determine the pathway’s priority. Pathways are prioritized based on their ability to carry contaminants from upland areas to the river at concentrations that exceed Screening Level Values (SLVs) listed in the JSCS (see p. 4-3 through 4-6 of the JSCS for more information on the prioritization process, and JSCS Table 3.1 for SLVs). Each site is then given a priority level based on the highest priority of the pathways. For example, if a site has two *low* priority pathways and one *high* priority pathway, the site is determined to be a *high* priority for source control. Definitions for *high*, *medium* and *low* priority determinations follow.

- High – High priority pathways and sites are those where a complete contaminant migration pathway exists and the upland source is significantly impacting the river or poses a significant and imminent threat to the river based on initial evaluation of key source control prioritization factors (listed on p. 4-3 of the JSCS). A primary consideration is that one or more media (soil, water or air) significantly exceed applicable SLVs at the point of discharge to the river (e.g., water at the end of a discharge pipe, or soil or material at the riverbank) or the most reliable and cost-effective data point (e.g., groundwater measured at the shoreline), or where a bioaccumulative chemical is detected at concentrations significantly above the SLV. In addition, if an upland source is violating DEQ narrative water quality criteria for the Willamette River, the site may be considered a high priority. High priority sites are expected to move forward with aggressive source control measures without delay or be subject to enforcement action.
- Medium – Medium priority pathways and sites are those where a complete contaminant migration pathway exists and the upland source is impacting the river or poses a significant and/or imminent threat to the river based on an initial evaluation of key source control prioritization factors (listed on p. 4-3 of the JSCS). A primary consideration is that one or more media exceed applicable SLVs, but not significantly, at the point of discharge to the river, or where a bioaccumulative chemical is detected at concentrations above the SLV.




Although exceedance of SLVs does not necessarily indicate that a site poses a significant and/or imminent threat or needs to immediately implement source control measures, it does indicate that the site may pose a threat to human health or the environment and that additional evaluation may be needed to determine if source control measures are required to prevent, minimize or mitigate the migration of hazardous substances to the river. If the site exceeds one or more SLVs, the need for further characterization or for implementation of source control measures will be based on a site-specific weight-of-evidence determination. Medium priority sites are expected to perform a weight-of-evidence evaluation to determine if source control measures are required (see p. 4-5 of the JSCS for more information on the weight-of-evidence evaluation).

- Low – Low priority pathways and sites are those where upland data indicate, based on an initial evaluation of key source control prioritization factors (listed on p. 4-3 JSCS), that the site likely poses a low threat to the river (e.g., concentrations are near or below SLVs) or where DEQ, in consultation with EPA, may issue an upland “No Further Action” (NFA) determination or lower the State’s priority of the site for further upland investigation or remedial action under DEQ’s cleanup authority. Source control measures will not be required at low priority sites unless determined necessary by the results of the Portland Harbor RIFS or ROD.
- p High – DEQ’s preliminary determination is that this is likely a high priority pathway or site based on available information. A final determination of pathway or site priority will be made upon completion of the SCE.
- p Med – DEQ’s preliminary determination is that this is likely a medium priority pathway or site based on available information. A final determination of pathway or site priority will be made upon completion of the SCE.
- p Low – DEQ’s preliminary determination is that this is likely a low priority pathway or site based on available information. A final determination of pathway or site priority will be made upon completion of the SCE.

### **Source Control Decisions and Status of Source Control Measures**

The Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs) columns in Table 4 provide information on actions taken or needed to control sources of contamination to the river, including the selected SCMs for each pathway, status of SCM implementation, status of EPA review, and ongoing operation and maintenance requirements.

For many sites listed in Table 4, boxes for information on SCDs and SCMs will be blank because source control work at those sites is still in the evaluation (SCE) phase. Other sites may be in the process of implementing SCMs, and still others may have completed all source control work. For those sites that have completed upland source control and SCMs have been determined to be effective, shading  indicates that work is finished at this point in time. Upon completion of the Portland Harbor in-water RIFS, however, DEQ will reevaluate all source control work to ensure that it adequately controlled contaminants to the final cleanup levels developed for the Harbor.

## 9.1 Acronyms and abbreviations

Agr	Agreement
AOC	Administrative Order on Consent
AS/SVE	Air sparge/soil vapor extraction – a Source Control Measure used to remove volatile contaminants from groundwater; often combined with treatment measures
AST	Above ground Storage Tank
AWQC	Ambient Water Quality Criteria
BMPs	Best Management Practices
BRA	Baseline Risk Assessment
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
COI	Contaminant of Interest – chemicals present in Portland Harbor at levels that could threaten human health and the environment
DEQ	Oregon Department of Environmental Quality
ECSI	DEQ's Environmental Cleanup Site Information database
EPA	Environmental Protection Agency
FS	Feasibility Study – a phase of the cleanup process; evaluating cleanup alternatives after the Remedial Investigation has been completed
GW	Groundwater
ICP	Independent Cleanup Pathway
IGA	Inter-Governmental Agreement
IRAM	Interim Remedial Action Measure
HVOCs	Halogenated Volatile Organic Compounds
JSCS	Joint Source Control Strategy – issued by DEQ and EPA in December 2005 <sup>6</sup>
LNAPL	Low density Non-Aqueous Phase Liquid
N/A	Not Applicable – used in Table 4 to indicate that the particular pathway does not exist at the site
NAPL	Non-Aqueous Phase Liquid
N&E	Nature and extent of the contamination at the site
NFA	No Further Action – a DEQ notice to a Responsible Party declaring that no further cleanup action is needed at the site
OF	Outfall
p&t	Pump & Treat system – a Source Control Measure used to remove or contain and treat contaminated groundwater
PA	Preliminary Assessment – an early assessment stage of the cleanup process
PCB	Polychlorinated Biphenyls
PH	Portland Harbor
PH Agr	Portland Harbor Agreement – a formal agreement to conduct the remedial investigation and source control work
PH Ltr Agr	Portland Harbor Letter Agreement – an initial agreement to conduct limited investigation and cleanup activities and cover DEQ's oversight costs
PM	DEQ Project Manager leading cleanup work at the site
PPA	Prospective Purchaser Agreement – a tool for negotiating and agreeing upon potential liability for prospective purchasers of sites

<sup>6</sup> The JSCS is available on DEQ's web site at <http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm>; click "Joint Source Control Strategy" on the left side bar.

PRP	Potentially Responsible Party
RD/RA	Remedial Design/Remedial Action – a phase of the cleanup process that occurs after the Record of Decision; designing and implementing the cleanup action
RI	Remedial Investigation – a phase of the cleanup process; investigating the nature and extent of contamination and understanding the potential risks posed by the contaminants to human health and the environment
RI/FS	Remedial Investigation/Feasibility Study
RP	Responsible Party
SC	Source Control
SCD	Source Control Decision
SCE	Source Control Evaluation
SCM	Source Control Measure
SLV	Screening Level Value – a contaminant-specific level established in the JSCS (see JSCS Table 3.1) that is used to screen upland pathways and sites to identify potential threats to human health and the environment.
SOW	Scope of Work
SVE	Soil Vapor Extraction – a Source Control Measure used to remove volatile contaminants from subsurface soils; often combined with soil vapor treatment
TCA	Trichloroethane
UIC	Underground Injection Control system
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program
VOCs	Volatile Organic Compounds
WO	Waiting on
XPA	Expanded Preliminary Assessment – an early assessment stage of the cleanup process

## 9.2 Contact information for DEQ Project Managers

Jim Anderson	(503) 229-6825	anderson.jim@deq.state.or.us
Dana Bayuk	(503) 229-5543	bayuk.dana@deq.state.or.us
Heidi Blischke	(503) 229-5556	blischke.heidi@deq.state.or.us
Tom Gainer	(503) 229-5326	gainer.tom@deq.state.or.us
Dan Hafley	(503) 229-5417	hafley.dan@deq.state.or.us
Jill Kiernan	(503) 229-6900	kiernan.jill@deq.state.or.us
Matt McClincy	(503) 229-5538	mcclincy.matt@deq.state.or.us
Kevin Parrett	(503) 229-6748	parrett.kevin@deq.state.or.us
Mark Pugh	(503) 229-5587	pugh.mark@deq.state.or.us
Mark Reeves	(503) 229-5157	reeves.mark@deq.state.or.us
Tom Roick	(503) 229-5502	roick.tom@deq.state.or.us
Mike Romero	(503) 229-5563	romero.mike@deq.state.or.us
Jennifer Sutter	(503) 229-6148	sutter.jennifer@deq.state.or.us
Bill Robertson	(503) 229-6843	robertson.bill@deq.state.or.us

**Table 1: Results of 1999 DEQ Project Manager evaluation of the potential relationship between in-water sediment contamination and upland sites already in the process of cleanup**  
(active sites in 1999, information based on 1999 data)

	Site	Project Manager Input	DEQ Follow-Up
✓	Mobil Oil	PAHs, As, & Zn are likely site related.	Evaluation to be completed as part of Mobil Oil site response.
✓	Gunderson	Pb, Hg, Zn, & PCBs at SD 151 likely to be attributed to site.	Current project does not encompass portion of site that is likely source for SD 151 contaminants. Will be identified for follow-up in site discovery.
		SD 143 elevations likely attributed to City outfall.	DEQ to work with City to assess SD 143 elevations.
✓	Elf Atochem (Arkema)	DDT is likely site related.	Consider other sources for PAHs, metals, & phthalates in site discovery.
			Evaluation of DDT & possibly contaminants identified above to occur as part of Arkema site response.
	Time Oil	PCP is currently the only contaminant of concern at this site.	Consider other sources of Zn, As, Cu, Hg, PAHs, & phthalates in site discovery work with City to assess impact from City sewer outfall.
✓	GASCO	PAHs are site related, metals may be site related.	Consider other sources for metals, phthalates & TBT in site discovery.
		Phthalates & TBT do not appear to be site related.	Evaluation of PAHs & possibly metals to occur as part of site response.
✓	NL Gould	Pb may be site related. Other compounds likely to be associated with other nearby active projects.	Evaluate as part of site response for this & other nearby sites.
✓	Rhone Poulenc	PAHs do not appear to be site related.	Evaluation of As, DDT, & assessment of Cr, phthalates, Ni, Zn, to be completed as part of site response.
		As & DDT are site related.	Consider other sources for PAHs, Cr, phthalates, Ni, & Zn in site discovery.
		Cr, phthalates, Ni, Zn are elevated at the site, but it is currently unclear if source is on-site.	
✓	Linnton Oil Fire	Extent of contamination limited to site-did not extend to river.	Other sources of contamination will be evaluated for sediment detections.
	Training Grounds	PCP not a primary contaminant of concern for the site.	
✓	Terminal 4 (Slip 3)	PAHs & metals are associated with the site.	Evaluation of PAHs, metals to be completed as part of site response.
		Phthalates are not a known site contaminant.	Consider other sources for phthalates in site discovery.
✓	ARCO	PAHs likely site related.	Evaluate as part of site response.
		As may not be site related.	

Site	Project Manager Input	DEQ Follow-Up
✓ McCormick &	As likely site related.	Contamination to be evaluated as part of site response.
✓ Baxter	Note that some contaminants at adjacent Willamette Cove site are attributable to this site: however, Hg, DDT are not.	Additional evaluation of Willamette Cove warranted.
✓ Riedel (Triangle Park)	Contaminants likely site-related.	Contamination to be evaluated as part of site response.
	TBT may have an up-river source as well.	Some TBT may be associated with Portland Shipyard.
	No known sources of DDT on site.	DDT may be harbor-wide issue.
✓ U. S. Moorings	PAHs may be site related or related to other nearby sources.	Evaluate as part of site response for this & other nearby sites.
✓ Willamette Cove	Cr, Hg, Ni, Zn, Cu, TBT, & some PAHs likely site related.	Evaluate as part of site response.
✓ Willbridge	Pb, Hg, & DDT likely to be site related.	Pb, Hg, & DDT to be evaluated as part of site response
	Phthalates not likely to be site related.	Consider other sources of phthalates thru site discovery.
✓ Swan Island (Portland Shipyard)	Contaminants likely site related, however, other sources are present as well.	Portland Shipyard data have been reviewed as part of site discovery effort.
		Other potential sources in this area have been identified.

As = arsenic

Zn = zinc

Pb = lead

Hg = mercury

Cr = chromium

Ni = nickel

Cu = copper

DDT = dichlorodiphenyltrichloroethane

PCP = pentachlorophenol

PAH = polycyclic aromatic hydrocarbons

TBT = tributyl tin

SD = storm drain

**Table 2: Sites identified by DEQ in 1999 as part of the Portland Harbor Site Discovery Process**  
(information is from 1999 data)\*\*

Proj  
due  
date

Reason Status

Site Name	Site Address	Priority
✓ ACF Industries	12160 NW St Helens Rd, Portland	High priority for RI
✓ Alder Creek Lumber	14456 Gillihan Loop Rd, Portland	Med/low priority for PA
✓ Babcock Land Company, LLC	NW Front Ave, Portland	Med/low priority for PA
✓ Chevron Asphalt	5501 NW Front Ave, Portland	High priority for XPA
✓ Christenson Oil	3821 NW St Helens Rd, Portland	High priority for XPA
City of Portland	6543 N Burlington, Portland	Med/low priority for PA
Water Pollution Lab		
City of Portland		High priority for RI
✓ Stormwater Outfalls		
✓ Columbia Sand & Gravel	10504 NW St Helens Rd, Portland	High priority for RI
✓ Container Recovery	3900 NW Yeon St, Portland	Active site at time of listing, but not considered potential PH source
✓ Crawford Street Corp	8524 N Crawford St, Portland	High priority for XPA
✓ Foss Marine/ Brix Maritime	9030 NW St Helens Rd, Portland	High priority for XPA
✓ Fred Devine Diving & Salvage	6211 N Ensign St, Portland	High priority for XPA
✓ Freightliner (Truck Plant)	6936 N Fathom St, Portland	Med/low priority for PA
✓ Front Ave, LP	4950-5200 NW Front Ave, Portland	High priority for XPA
✓ GATX Linnton Terminal	11400 NW St Helens Rd, Portland	High priority for RI
✓ Georgia Pacific Linnton	12222 NW St Helens Rd, Portland	High priority for XPA
✓ Hampton Lumber Sales/CMI NW	4950 NW Front Ave, Portland	High priority for XPA
✓ Hendren Tow Boats	8444 NW St Helens Rd, Portland	High priority for XPA
✓ Jefferson Smurfit	9040 N Burgard Way, Portland	High priority for XPA
✓ Lakeside Industries	4850 NW Front Ave, Portland	Med/low priority for PA
✓ Linnton Plywood Association	10504 NW St Helens Rd, Portland	High priority for RI
✓ Lone Star NW	5034 NW Front Ave, Portland	High priority for XPA
✓ Mar Com Holding LLC	9070 & 8970 NW Bradford, Portland	High priority for RI
✓ Marine Finance	8444 NW St Helens Rd, Portland	High priority for XPA
✓ McCall Oil/Great Western	5480 NW Front Ave, Portland	High priority for RI
✓ NW Pipe Company	12005 N Burgard Way, Portland	High priority for XPA
✓ Oregon Steel Mills	14400 N Rivergate, Portland	High priority for RI
✓ Owens-Coring Fiberglass	11444 NW St Helens Rd, Portland	High priority for XPA
✓ PGE Harborton Substation	12430 NW St Helens Rd, Portland	High priority for RI
✓ Port of Portland Terminal 4 (ASA)	11040 NW Lombard, Portland	Med/low priority for PA
✓ Port of Portland Terminal 4 (Slip 1)	11040 NW Lombard, Portland	Med/low priority for PA
✓ Port of Portland Terminal 5	15540 N Lombard, Portland	Med/low priority for PA
✓ RK Storage	10937 NW Front Ave, Portland	Med/low priority for PA
✓ Ro-Mar Transportation	9333 N Time Oil Rd, Portland	Med/low priority for PA
✓ Santa Fe Pacific Pipeline	6565 NW St Helens Rd, Portland	Med/low priority for PA
✓ Schnitzer Kittridge	4959 NW Front Ave, Portland	Med/low priority for PA
✓ Schnitzer Steel Works (Schnitzer Burgard)	12005 N Burgard Way, Portland	High priority for RI
✓ Shaver Transportation	4900 NW Front Ave, Portland	High priority for XPA
✓ Texaco Terminal/Loading Dock	3800 NW St Helens Rd, Portland	High priority for RI
✓ Time Oil (St Helens Facility)	9400 NW St Helens Rd, Portland	Med/low priority for PA
✓ U. S. Coast Guard	6767 N Basin Ave, Portland	High priority for RI
✓ Wacker Siltronics	7200 NW Front Ave, Portland	High priority for RI
Transloader International (General Construction Company)	8444 NW St Helens Rd, Portland	Med/low priority for PA
✓ UPRR St Johns Tank Farm	6908 N Roberts, Portland	Active site at time of listing, but not considered potential PH source

\*\* This list does not include active sites listed in Table 1

RI = Remedial Investigation; PA = Preliminary Assessment; XPA = Expanded Preliminary Assessment  
PH = Portland Harbor

High-Studies  
done  
get to work  
not PA & XPA/RI

**Table 3: New Sites in Portland Harbor identified through the Site Discovery Process (2000 to present)**

Site Name	Site Address	Priority
✓ Anderson Brothers Property	5275 & 5315 NW St Helens Rd, Portland	Med/low priority for PA
✓ Calbag Metals	4927 NW Front Ave, Portland	High priority for XPA
✓ Columbia American Plating	3003 NW 35th Ave, Portland	PPA
✓ Consolidated Metco	13940 N Rivergate Blvd, Portland	High priority for XPA
✓ Freightliner (Parts Plant)	5400 N Basin, Portland	High priority for XPA
✓ GE Decommissioning	2727 NW 29th Ave, Portland	High priority for XPA
✓ GS Roofing	6350 NW Front Ave, Portland	Med/low priority for PA
✓ Galvanizers	2406 NW 30th Ave, Portland	High priority for XPA
✓ Goldendale Aluminum	2600 N River St, Portland	High priority for XPA
✓ Guild Lake Rail Yard	3500 NW Yeon, Portland	High priority for RI
✓ Olympic Pipeline	9420 NW St Helens Rd, Portland	High priority for XPA
✓ PGE Forest Park	4400 NW Block St, Portland	Med/low priority for PA
✓ PGE Substation E	2635 NW Front Ave, Portland	Med/low priority for PA
✓ Port of Portland Terminal 1 S	2100 NW Front Ave, Portland	High priority for RI
✓ Port of Portland Terminal 1 N	2200 NW Front Ave, Portland	Med/low priority for PA
✓ Port of Portland Terminal 2	3556 NW Front Ave, Portland	Med/low priority for PA
✓ Premier Edible Oil	10400 N Burgard Way, Portland	High priority for RI
✓ Sulzer Pump	2800 NW front Ave, Portland	High priority for XPA
✓ UPRR Albina Yard	2745 N Interstate, Portland	High priority for XPA

RI = Remedial Investigation; PA = Preliminary Assessment; XPA = Expanded Preliminary Assessment  
PPA = Performance Partnership Agreement

Order

Priority H M L NS  
Alpha

Table 4

DEQ Milestone Report  
Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

3/24/2008

Shading indicates that upland source control work has been completed

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)										
Site information					Project status										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)										
Site name	ECR #	Row	Address	DEQ #	Type of agreement directing source	Project status	DATE last modified (m-m)	Potential contaminant	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Pathway determination	Pathway priority level	Site priority level (p)	Status of EPA review of SCE decision	Source Control alternatives evaluation and schedule (m-m)	Selected SCMs	Status of EPA review of SCM selection decision	SCM activities completed to date (m-m)	Major or volatile contaminants controlled	Progress of SCE activities to be done and schedule (m-m)	DATE SCE completed (m-m)	Status of EPA review of completed SCE	Operation and maintenance requirements	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
Terminal 5	1888	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gahner	IGA	XPA	03/02/08	Overland Transport/Sheet Flow	Completed		2006	Insignificant pathway; no actions recommended	Low	to be determined	Waiting on SCE to be completed 2008										
Terminal 5	1888	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gahner	IGA	XPA	03/02/08	Bank Erosion	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE to be completed 2008										
Terminal 5	1888	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gahner	IGA	XPA	03/02/08	Groundwater	Ongoing	Coordinate with Oregon Steel Mills monitoring	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed 2008										
Terminal 5	1888	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gahner	IGA	XPA	03/02/08	Stormwater	Ongoing		2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed 2008										
Terminal 5	1888	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gahner	IGA	XPA	03/02/08	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Terminal 5	1888	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gahner	IGA	XPA	03/02/08	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Held Blackie	PH Agr for R/SCM (500)	RI	03/15/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	no pathway, berm prevents overland transported flow	None	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Held Blackie	PH Agr for R/SCM (500)	RI	03/15/08	Bank Erosion	Ongoing	Interpretation of sampling data	April 2008	Pathway is complete	p High		Waiting on SCE to be completed 2008										
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Held Blackie	PH Agr for R/SCM (500)	RI	03/15/08	Groundwater (AST, AUCCL)	Completed			Insignificant pathway; no actions recommended	Low		SCM submitted to EPA 10/20/04, no comments received		Soil removal completed at time of spill, prior to SCE						SCE submitted to EPA 10/20/04, no comments received		
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Held Blackie	PH Agr for R/SCM (500)	RI	03/15/08	Groundwater (MVA, AUCCL)	Ongoing	Interpretation of sampling data	December 2008	to be determined	to be determined		Waiting on SCE to be completed										
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Held Blackie	PH Agr for R/SCM (500)	RI	03/15/08	Stormwater	Ongoing	Further investigation of stormwater system	December 2008	Pathway is complete	p High		Waiting on SCE to be completed 2008										
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Held Blackie	PH Agr for R/SCM (500)	RI	03/15/08	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Held Blackie	PH Agr for R/SCM (500)	RI	03/15/08	Other - current project pending (see map)	Not Started	To be determined	No current schedule	Waiting on SCE to be completed			Waiting on SCE to be completed										
Eco Landfill Seville Island	4408	2.8	14444 NW Gilman Loop	Mark Reeves	Industrial landfill disposal permit	PA	03/20/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Eco Landfill Seville Island	4408	2.8	14444 NW Gilman Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/08	Bank Erosion	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Eco Landfill Seville Island	4408	2.8	14444 NW Gilman Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/08	Groundwater	Ongoing	groundwater monitoring ongoing	2007	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed 2007										
Eco Landfill Seville Island	4408	2.8	14444 NW Gilman Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/08	Stormwater	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Eco Landfill Seville Island	4408	2.8	14444 NW Gilman Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/08	Overwater Activities	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Eco Landfill Seville Island	4408	2.8	14444 NW Gilman Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/08	Other	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Consolidated Metco	3295	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	P Low	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Consolidated Metco	3295	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/08	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



# DEQ Milestone Report Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site information					Project status										SCM status											
Site name	ECM #	River mile	Address	DEQ PM	Type of agreement/discharge source	Project status	DEQ M1 modified (m-v)	POB/POU contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Site priority level	Review of EPA review of SCE decision	SCM status alternatives evaluation and schedule (m-v)	Selected SCMs	Review of EPA review of SCM selection decision	SCM status completed to date (m-v)	SCM status of contaminants controlled	Proposed SCM activities to be done and schedule (m-v)	SCM status completed (m-v)	Review of EPA review of completed SCM	SCM status of EPA maintenance requirements		
												Pathway determination	Pathway priority level													
Consolidated Meico	3285	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/06	Groundwater	Ongoing	DEQ is revisiting draft SCD	2007	Waiting on SCE to be completed	p Low	High	Waiting on SCE to be completed											
Consolidated Meico	3285	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/06	Stormwater	Ongoing	DEQ is revisiting draft SCD	2007	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed											
Consolidated Meico	3285	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Consolidated Meico	3285	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Groundwater (170/14 um Phosphate)	Ongoing	RI Report Final 12/05	SCE to be submitted 5/06	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed		Passive NAPL recovery pending SCE									
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Groundwater (Highly Polluted)	Completed			SCMs retard plume migration and prevent plume discharge to private stormwater outfall	High		SCE submitted to EPA	alternatives evaluation completed	Source area pump & treat; install chemical oxidant; go to intercept pump & treat	SCM submitted to EPA May 2004, partners responded with questions	Ongoing pump & treat; 3 rounds of install chemical oxidant	23 million gallons of groundwater pumped and treated	ongoing groundwater pump & treat			maintenance and monitoring of pump & treat system		
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Stormwater	Ongoing		SCE to be submitted 5/06	Insignificant pathway (see above re groundwater)	p Low		Waiting on SCE to be completed											
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Overwater Activities	Ongoing		SCE to be submitted 5/06	No known current sources (rolls reported to OERS)	p Low		Waiting on SCE to be completed											
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
City of Portland Outfalls	170	3.4 E	10350 Time Out Rd	Tom Rold	Pre-PH Agr. (9/98)	RI	03/07/06	Groundwater	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)																																																																																																																																																																																																																																																																																									
Site Information					Project status										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)																																																																																																																																																																																																																																																																																									
Site name	ECSI #	River mile	Address	DEQ PM	Type of agreement (direct source)	Project status	DEQ SCD modified (m-d-y)	POTENTIAL contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed			STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of EPA review of SCE decision	STATUS of

## 374/2008

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)										
Site Information					Project status										SCDs and SCMs										
Site name	ECIS #	River mile	Address	DEQ PM	1994 RI Agreement drainage source	Project status	Date last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed	Pathway determination	Pathway priority level	Site priority level	SCDs and SCMs alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM activities completed to date (m-y)	Plans or Volume of contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	Date SCM completed (m-y)	Status of EPA review of completed SCM	Operation and maintenance requirements	
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	EPA reviewed and commented	No SCM needed								
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Bank Erosion	N/A	N/A	N/A	N/A	none	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Stormwater	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Other	N/A	N/A	N/A	N/A	none	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Bank Erosion	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Stormwater	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Other	N/A	N/A	N/A	N/A	none	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Bank Erosion	Completed			Insignificant pathway; no actions recommended	Low	Low	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson Burial Ground	2370	3.9 W	12222 NW Marina	Tom Gaiser	PH Letter Agr for XPA (12/09)	XPA	03/06/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low	Low	to be										

## 3242905

Confirmed or suspected Sources of contamination to the river				Source Control Evaluation (SCE)								Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)													
Site Information				Source Control Evaluation (SCE)								Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)													
Site name	ECN #	River mile	Address	DEQ P#	Type of agreement/directive source	Project status	Date last modified (m-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basic for determination that source control is needed	Pathway determination	Pathway priority level	Site priority level	Status of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM activities completed to date (m-y)	Mass of volume of contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	Date SCM completed (m-y)	Status of EPA review of completed SCM	Operation life/maintenance requirements
NW Pipe	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NW Pipe	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Groundwater	Ongoing	DEQ to complete review of SCE report prepared by RP	2006	GW suspected migration pathway		to be determined		Waiting on SCE to be completed 2006									
NW Pipe	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Stormwater	Ongoing	DEQ to complete review of SCE report prepared by RP	2006	SW suspected migration pathway		to be determined		Waiting on SCE to be completed 2006									
NW Pipe	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NW Pipe	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Other	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Bank Erosion	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Groundwater	Ongoing	DEQ to complete review of SCE report prepared by RP	2006	GW suspected migration pathway		to be determined		Waiting on SCE to be completed 2006									
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Stormwater	Ongoing	DEQ to complete review of SCE report prepared by RP	2006	SW suspected migration pathway		to be determined		Waiting on SCE to be completed 2006									
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Other	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Bank Erosion	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Groundwater	Ongoing	DEQ to complete review of SCE report prepared by RP	2006	GW suspected migration pathway		to be determined		Waiting on SCE to be completed 2006									
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Stormwater	Ongoing	DEQ to complete review of SCE report prepared by RP	2006	SW suspected migration pathway		to be determined		Waiting on SCE to be completed 2006									
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Allyson CV (The Zipline Company)	138	3.9 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (2005)	RI	03/05/06	Other	N/A	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Schultz Burgard	2363	4.1 E	12005 N Burgard	Mike Romero	PH Agr for R/SCM (3000)	RI	03/08/06	Overland Transport/Sheet Flow	Not Started	To be determined	2006	Waiting on SCE to be completed		to be determined		Waiting on SCE to be completed		Liability peer engineering improvements to capture sheet flow stormwater							

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)								Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)															
Site Information					Project status												Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site name	ECRI #	River mile	Address	DEQ PM	Type of agreement (direct source)	Project status	DEQ MTR modified (m-v)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Status of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-v)	Selected SCMs	Status of EPA review of SCM selection decision	SCM schedule completed to date (m-v)	Amount of volume of contaminants controlled	Proposed SCM activities to be done and schedule (m-v)	SCM schedule completed (m-v)	Status of EPA review of completed SCM	Operational and maintenance requirements					
												Pathway determination	Pathway priority level	Site priority level														
Terminal 4 Slip 1	2366	4.3 E	11040 N Lombard	Tom Gahner	PH Agr for RVSCCE	RI	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A					
Terminal 4 Slip 1	2366	4.3 E	11040 N Lombard	Tom Gahner	PH Agr for RVSCCE	RI	03/06/06	Bank Erosion	Ongoing	SCM necessary; coordinate with T4 Early Action	SOW under development, due 2008	Pathway is complete	p High		Waiting on SCE to be completed	schedule for completing 4th evaluation report fall 2006												
Terminal 4 Slip 1	2366	4.3 E	11040 N Lombard	Tom Gahner	PH Agr for RVSCCE	RI	03/06/06	Groundwater	Ongoing	Phase 3 RI sampling	SOW under development, due 2008	Preliminary determination that pathway is insignificant	p Low		Waiting on SCE to be completed													
Terminal 4 Slip 1	2366	4.3 E	11040 N Lombard	Tom Gahner	PH Agr for RVSCCE	RI	03/06/06	Stormwater	Ongoing	Phase 3 RI sampling	SOW under development, due 2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed													
Terminal 4 Slip 1	2366	4.3 E	11040 N Lombard	Tom Gahner	PH Agr for RVSCCE	RI	03/06/06	Overwater Activities	N/A	N/A	N/A	No known current sources (as reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
Terminal 4 Slip 1	2366	4.3 E	11040 N Lombard	Tom Gahner	PH Agr for RVSCCE	RI	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
Lifton Plywood	2370	4.6 W	10604 NW 31st	Mike McCleary	PH Letter Agr for XPA (301)	XPA completed	03/13/06	Overland Transport/Sheet Flow	Completed			SCM submitted to EPA April 2004 (no comments received)	Low	Low	EPA reviewed and commented	Interim control of two spill tanks and debris cleanup in 2002 and 2003						Received review 8/29/03						
Lifton Plywood	2373	4.6 W	10604 NW 31st	Mike McCleary	PH Letter Agr for XPA (301)	XPA completed	03/13/06	Bank Erosion	Completed			Insignificant pathway; no action recommended	Low		EPA reviewed and commented	No SCM needed						Received review 8/29/03						
Lifton Plywood	2375	4.6 W	10604 NW 31st	Mike McCleary	PH Letter Agr for XPA (301)	XPA completed	03/13/06	Groundwater	Completed			Insignificant pathway; no action recommended	Low		EPA reviewed and commented	No SCM needed						Received review 8/29/03						
Lifton Plywood	2379	4.6 W	10604 NW 31st	Mike McCleary	PH Letter Agr for XPA (301)	XPA completed	03/13/06	Stormwater	Completed			Insignificant pathway; no action recommended	Low		EPA reviewed and commented	Ongoing stormwater pipe and monitoring						Received review 8/29/03						
Lifton Plywood	2375	4.6 W	10604 NW 31st	Mike McCleary	PH Letter Agr for XPA (301)	XPA completed	03/13/06	Overwater Activities	Completed			Insignificant pathway; no action recommended	Low		EPA reviewed and commented	No SCM needed						Received review 8/29/03						
Lifton Plywood	2373	4.6 W	10604 NW 31st	Mike McCleary	PH Letter Agr for XPA (301)	XPA completed	03/13/06	Other	N/A	N/A	N/A	N/A	none		N/A		N/A					N/A						
Terminal 4 Slip 3	272	4.8 E	10400 Lombard	Tom Ruck	Judgment for RDRA (404)	RDRA	03/07/06	Overland Transport/Sheet Flow	Ongoing	Recontamination Assessment of Slip 1		Waiting on SCE to be completed	p Low	High	Waiting on SCE to be completed													
Terminal 4 Slip 3	272	4.8 E	10400 Lombard	Tom Ruck	Judgment for RDRA (404)	RDRA	03/07/06	Bank Erosion	Ongoing	Pencil pitch investigation	SOW under development, due spring 2008	Contaminated river bank soils - pencil pitch investigation continuing	p Low		Waiting on SCE to be completed													
Terminal 4 Slip 3	272	4.8 E	10400 Lombard	Tom Ruck	Judgment for RDRA (404)	RDRA	03/07/06	Groundwater	Completed			Complete pathway - remedy recommended and implemented	High		EPA reviewed and commented, 2/2003	Bank excavation and backfill remedial action, NAPL recovery, monitoring			EPA reviewed and commented, 2/2003	Bank excavation and backfill remedial action (REBRA) 11/04	2,700 cubic yards of contaminated soil removed, 24.4 gallons NAPL recovered to date	NAPL recovery and monitoring ongoing						
Terminal 4 Slip 3	272	4.8 E	10400 Lombard	Tom Ruck	Judgment for RDRA (404)	RDRA	03/07/06	Stormwater	Ongoing	Recontamination Assessment of Slip 1		Waiting on SCE to be completed	p Med		Waiting on SCE to be completed													
Terminal 4 Slip 3	272	4.8 E	10400 Lombard	Tom Ruck	Judgment for RDRA (404)	RDRA	03/07/06	Overwater Activities	Ongoing	Early Action pending		Historic releases	p High		Waiting on SCE to be completed													
Terminal 4 Slip 3	272	4.8 E	10400 Lombard	Tom Ruck	Judgment for RDRA (404)	RDRA	03/07/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
UPRR St. Johns Twp. Farm	2017	4.8 E	8500 N Roberts	Tom Ruck	Pre-Ph VCP Letter Agr	N/A	03/07/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	Low														
UPRR St. Johns Twp. Farm	2017	4.8 E	8500 N Roberts	Tom Ruck	Pre-Ph VCP Letter Agr	N/A	03/07/06	Bank Erosion	N/A	N/A	N/A	N/A	none															
UPRR St. Johns Twp. Farm	2017	4.8 E	8500 N Roberts	Tom Ruck	Pre-Ph VCP Letter Agr	N/A	03/07/06	Groundwater	Completed			Insignificant pathway (no action recommended)	Low		SCM submitted to EPA April 2004 (no comments received)							SCM submitted to EPA April 2004 (no comments received)						

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river				Source Control Evaluation (SCE)								Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site Information				TYDRI agreement directs source	Project status	DEQ last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Site priority level	STATUS of EPA review of SCE decision	SCM(s) CONVEI alternative evaluation and schedule (m-y)	Selected SCMs	STATUS of EPA review of SCM selection decision	SCM(s) completed to date (m-y)	WAS or WOULD be contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	Date SCM completed (m-y)	STATUS of EPA review of completed SCM	Ongoing and maintenance requirements
Site name	ECR #	River mile	Address								DEQ P#	Pathway determination											
UPRR St. Johns Tank Farm	2017	4.8 E	8908 N Roberts	Tom Ruck	Pre-PH VCP Letter Agr.	N/A	03/07/06	Stormwater	Completed		Insignificant pathway; no actions recommended	Low	High	SCE submitted to EPA April 2004; no comments received		No SCM needed							
UPRR St. Johns Tank Farm	2017	4.8 E	8908 N Roberts	Tom Ruck	Pre-PH VCP Letter Agr.	N/A	03/07/06	Overwater Activities	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
UPRR St. Johns Tank Farm	2017	4.8 E	8908 N Roberts	Tom Ruck	Pre-PH VCP Letter Agr.	N/A	03/07/06	Other	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Port of Portland Auto Storage Area (ASA)	2842	5.0 E	10400 Lombard	Tom Garner	Pre-PH DEQ/Port ISA (11/00)	N/A	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	none	Low	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Port of Portland Auto Storage Area (ASA)	2842	5.0 E	10400 Lombard	Tom Garner	Pre-PH DEQ/Port ISA (11/00)	N/A	03/06/06	Bank Erosion	Completed		Insignificant pathway; no actions recommended	Low		EPA reviewed and commented 8/04		No SCM needed							
Port of Portland Auto Storage Area (ASA)	2842	5.0 E	10400 Lombard	Tom Garner	Pre-PH DEQ/Port ISA (11/00)	N/A	03/06/06	Groundwater	Completed		Insignificant pathway; no actions recommended	Low		EPA reviewed and commented 8/04		No SCM needed							
Port of Portland Auto Storage Area (ASA)	2842	5.0 E	10400 Lombard	Tom Garner	Pre-PH DEQ/Port ISA (11/00)	N/A	03/06/06	Stormwater	Completed		Insignificant pathway; no actions recommended	Low		EPA reviewed and commented 8/04		No SCM needed							
Port of Portland Auto Storage Area (ASA)	2842	5.0 E	10400 Lombard	Tom Garner	Pre-PH DEQ/Port ISA (11/00)	N/A	03/06/06	Overwater Activities	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Port of Portland Auto Storage Area (ASA)	2842	5.0 E	10400 Lombard	Tom Garner	Pre-PH DEQ/Port ISA (11/00)	N/A	03/06/06	Other	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Exxon Mobil	137	5.1 W	9420 NW St. Helena	Held Blackie	VCP Agr for Remedial Action (5/02)	RD/RA	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	none	High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Exxon Mobil	137	5.1 W	9420 NW St. Helena	Held Blackie	VCP Agr for Remedial Action (5/02)	RD/RA	03/06/06	Bank Erosion	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Exxon Mobil	137	5.1 W	9420 NW St. Helena	Held Blackie	VCP Agr for Remedial Action (5/02)	RD/RA	03/06/06	Groundwater	Completed		Groundwater is a complete pathway	High		SCE planned to be submitted to EPA in Spring 2006		Operating air sparge & SVE system. Expansion of air sparge system (1/2006) - SIP has 1 yr. to demonstrate protectiveness.					SCM to be submitted to EPA in late 2006		
Exxon Mobil	137	5.1 W	9420 NW St. Helena	Held Blackie	VCP Agr for Remedial Action (5/02)	RD/RA	03/06/06	Stormwater	Ongoing	Implementing the SCE statement of work	SOW under development, due 2006	Waiting on SCE to be completed	to be determined	Waiting on SCE to be completed 2006									
Exxon Mobil	137	5.1 W	9420 NW St. Helena	Held Blackie	VCP Agr for Remedial Action (5/02)	RD/RA	03/06/06	Overwater Activities	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Exxon Mobil	137	5.1 W	9420 NW St. Helena	Held Blackie	VCP Agr for Remedial Action (5/02)	RD/RA	03/06/06	Other - current NPDES permitted discharge	Not Started	To be determined	No current schedule	Waiting on SCE to be completed	to be determined	Waiting on SCE to be completed									
Olympic Pipeline Portland Facility within ExxonMobil	3342	5.2W	9420 NW St. Helena	Held Blackie	ICP	XPA	03/02/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Olympic Pipeline Portland Facility within ExxonMobil	3342	5.2W	9420 NW St. Helena	Held Blackie	ICP	XPA	03/02/06	Bank Erosion	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Olympic Pipeline Portland Facility within ExxonMobil	3342	5.2W	9420 NW St. Helena	Held Blackie	ICP	XPA	03/02/06	Groundwater	Completed		Insignificant pathway; no actions recommended	Low		Waiting on SCE completion; 2007		Conducted soil removal following petroleum spill in mid 1990s							

# DEQ Milestone Report Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

3/24/2006

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river				Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site Information				Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site name	ECRI #	River mile	Address	DEQ PM	TYPE of agreement (direct/indirect)	Project status	DEQ M1 modified (m-d-y)	POTENTIAL contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Site priority level	STATUS of EPA review of SCE decision	SOURCE control alternatives evaluation and schedule (m-y)	Selected SCMs	STATUS of EPA review of SCM selection decision	SCM activities completed to date (m-y)	STATUS of Voluntary or contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	DEQ SCM completed (m-y)	STATUS of EPA review of completed SCM	Operation and maintenance requirements	
												Pathway determination	Pathway priority level												
Olympic Pipeline Portland Facility within ExonMobil	3342	5.2W	9420 NW St Helens	Held Blacklie	ICP	XPA	03/02/06	Stormwater	Ongoing	Dependant upon groundwater conditions	2007	Waiting on SCE to be completed.	to be determined	p High	Waiting on SCE completion, 2007										
Olympic Pipeline Portland Facility within ExonMobil	3342	5.2W	9420 NW St Helens	Held Blacklie	ICP	XPA	03/02/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Olympic Pipeline Portland Facility within ExonMobil	3342	5.2W	9420 NW St Helens	Held Blacklie	ICP	XPA	03/02/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
BP Terminal Z2T (ARCO)	1528	5.3 W	9630 NW St Helens	Tom Gainer	PH Agr for R/SCM (5/00)	RI	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
BP Terminal Z2T (ARCO)	1528	5.3 W	9630 NW St Helens	Tom Gainer	PH Agr for R/SCM (5/00)	RI	03/06/06	Bank Erosion	N/A	No Bank -concrete sea wall	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
BP Terminal Z2T (ARCO)	1528	5.3 W	9630 NW St Helens	Tom Gainer	PH Agr for R/SCM (5/00)	RI	03/06/06	Groundwater	Ongoing	Investigation of GW on adjacent property	Spring 2006	Free product & dissolved phase potentially reaching river	p High		Waiting on SCE to be completed	alternatives evaluation completed 7/2004 for on site GW	Hydraulic control and GW pump & test system	SCD submitted to EPA 6/2004; no comments received	Hydraulic Control system installed 1/2005	700 linear feet of plume controlled at dewaterbank	ongoing		effectiveness monitoring		
BP Terminal Z2T (ARCO)	1528	5.3 W	9630 NW St Helens	Tom Gainer	PH Agr for R/SCM (5/00)	RI	03/06/06	Stormwater	Ongoing	Sampling stormwater system	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed 2006										
BP Terminal Z2T (ARCO)	1528	5.3 W	9630 NW St Helens	Tom Gainer	PH Agr for R/SCM (5/00)	RI	03/06/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
BP Terminal Z2T (ARCO)	1528	5.3 W	9630 NW St Helens	Tom Gainer	PH Agr for R/SCM (5/00)	RI	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Mar Com Marine (N Parcel)	2360	5.8 E	8790 N Bradford	Mike Romero	PH Agr for R/SCM (11/01)	RDRA	03/09/06	Overland Transport/Sheet Flow	Completed	overland soil transport suspected migration pathway		overland soil transport suspected migration pathway	Medium	Medium	EPA reviewed and commented 2004	alternatives evaluation completed in 2004	removal of 30 cubic yards of sandblast grit and soil; DEQ issue SCD in 5/2004	EPA reviewed and approved 2004	none yet		no current schedule; RP went bankrupt; potential future owner will conduct source control work				
Mar Com Marine (N Parcel)	2360	5.8 E	8790 N Bradford	Mike Romero	PH Agr for R/SCM (11/01)	RDRA	03/09/06	Bank Erosion	Not Started	To be determined	No current schedule	Deferred investigation to Mar Com South Parcel	to be determined		Waiting on SCE to be completed		Deferred investigation to Mar Com South Parcel								
Mar Com Marine (N Parcel)	2360	5.8 E	8790 N Bradford	Mike Romero	PH Agr for R/SCM (11/01)	RDRA	03/09/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low			EPA reviewed and commented 2004	N/A								
Mar Com Marine (N Parcel)	2360	5.8 E	8790 N Bradford	Mike Romero	PH Agr for R/SCM (11/01)	RDRA	03/09/06	Stormwater	Completed			Insignificant pathway; no actions recommended	Low			EPA reviewed and commented 2004	N/A								
Mar Com Marine (N Parcel)	2360	5.8 E	8790 N Bradford	Mike Romero	PH Agr for R/SCM (11/01)	RDRA	03/09/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Mar Com Marine (N Parcel)	2360	5.8 E	8790 N Bradford	Mike Romero	PH Agr for R/SCM (11/01)	RDRA	03/09/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Brits Maritime (aka Foss)	2364	5.7 W	9030 NW St Helens	Dane Bayuk	PH Agr for R/SCM (5/02)	RI	03/07/06	Overland Transport/Sheet Flow	N/A	N/A; site is entirely paved and/or developed	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Brits Maritime (aka Foss)	2364	5.7 W	9030 NW St Helens	Dane Bayuk	PH Agr for R/SCM (5/02)	RI	03/07/06	Bank Erosion	N/A	N/A; heavily armored with rip-rap; no significant habitat	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Brits Maritime (aka Foss)	2364	5.7 W	9030 NW St Helens	Dane Bayuk	PH Agr for R/SCM (5/02)	RI	03/07/06	Groundwater	Ongoing	Continue monitoring; compile available site data for RI and source control decision	2006	Pathway is complete	to be determined		Waiting on SCE to be completed.										
Brits Maritime (aka Foss)	2364	5.7 W	9030 NW St Helens	Dane Bayuk	PH Agr for R/SCM (5/02)	RI	03/07/06	Stormwater	N/A	Implemented BMPs; storm water permit not required	N/A	N/A	none	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		

# DEQ Milestone Report Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

3/24/2006

Shading indicates that upland source control work has been completed

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site Information					Project status										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site name	ECR #	River mile	Address	DEQ PM	Type of agreement/directive source	Project status	DEQ last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed			STATUS of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	STATUS of EPA review of SCM selection decision	SCM activities completed to date (m-y)	DATE of removal of contaminants controlled	Proposed SCE activities to be done and schedule (m-y)	DATE SCE completed (m-y)	STATUS of EPA review of completed SCM	Operation and maintenance requirements
												Pathway determination	Pathway priority level	Site priority level										
Bix Maritime (aka Fox)	2364	5.7 W	9030 NW St Helens	Dene Beryl	PH Agt for RUSCM (502)	RI	03/07/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Bix Maritime (aka Fox)	2364	5.7 W	9030 NW St Helens	Dene Beryl	PH Agt for RUSCM (502)	RI	03/07/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mar Com (S Parcel)	2350	5.8 E	8780 N Bradford	Mike Romero	Negotiating PH Agt	RI	03/09/06	Overland Transport/Sheet Flow	Ongoing	Overland flows down concrete driveway and across large unpaved site areas need to be investigated	2006	Waiting on SCE to be completed	to be determined	to be determined	Waiting on SCE to be completed in 2006									
Mar Com (S Parcel)	2350	5.8 E	8780 N Bradford	Mike Romero	Negotiating PH Agt	RI	03/09/06	Bank Erosion	Ongoing	Investigation must include North Parcel bank and beach	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed in 2006									
Mar Com (S Parcel)	2350	5.8 E	8780 N Bradford	Mike Romero	Negotiating PH Agt	RI	03/09/06	Groundwater	Ongoing	Need to determine N&E in RI	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed in 2006									
Mar Com (S Parcel)	2300	5.8 E	8780 N Bradford	Mike Romero	Negotiating PH Agt	RI	03/09/06	Stormwater	Ongoing	Need to determine N&E in RI	early 2007	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed in 2006									
Mar Com (S Parcel)	2350	5.8 E	8780 N Bradford	Mike Romero	Negotiating PH Agt	RI	03/09/06	Overwater Activities	Ongoing	Need to complete N&E in RI; refers to historic overwater activities	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed in 2006		Floating dry dock sold in 2004, and removed from site							
Mar Com (S Parcel)	2350	5.8 E	8780 N Bradford	Mike Romero	Negotiating PH Agt	RI	03/09/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Marine Plastics	2302	5.8 W	8444 NW St Helens	Mark Pugh	PPA	RDRA	03/03/06	Overland Transport/Sheet Flow	Completed	contaminated over-saturated criteria in soil potentially susceptible to runoff			Low	Low	SCE submitted to EPA 8/20/04. No comments received	alternatives evaluation completed 2004	Oil and fuel spill contamination; coping with clean up and/or building	SCM submitted to EPA 8/20/04, no comments received	Soil removed 08/00; selected site areas capped with building and/or clean up	1,190 cubic yards of soil removed (estimated); report pending	complete, report pending	11/05	SCM completion report pending; spring 2007	institutional control for cap and building will be required
Marine Plastics	2352	5.8 W	8444 NW St Helens	Mark Pugh	PPA	RDRA	03/03/06	Bank Erosion	Completed	insignificant pathway; no actions recommended			Low		SCE submitted to EPA 8/20/04. No comments received	alternatives evaluation completed 2004	No SCM needed							
Marine Plastics	2352	5.8 W	8444 NW St Helens	Mark Pugh	PPA	RDRA	03/03/06	Groundwater	Completed	insignificant pathway; no actions recommended			Low		SCE submitted to EPA 8/20/04. No comments received	alternatives evaluation completed 2004	No SCM needed							
Marine Plastics	2352	5.8 W	8444 NW St Helens	Mark Pugh	PPA	RDRA	03/03/06	Stormwater	N/A	No current system; new system to be installed. PPA requires 1 year of monitoring			Low		N/A		No current system; new system to be installed. PPA requires 1 year of 144 monitoring						Storm drain system to be installed by spring/summer 2006. Minimum 5 storm water sampling events will be required following installation	SCM completion report pending; spring 2007
Marine Plastics	2302	5.8 W	8444 NW St Helens	Mark Pugh	PPA	RDRA	03/03/06	Overwater Activities	N/A	No known current sources (spills reported to OERS)			none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Marine Plastics	2352	5.8 W	8444 NW St Helens	Mark Pugh	PPA	RDRA	03/03/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
US Moorings	1841	6.2	8010 NW St Helens Rd.	EPA lead; Kristine Koch	AOC	RI	03/15/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
US Moorings	1841	6.2	8010 NW St Helens Rd.	EPA lead; Kristine Koch	AOC	RI	03/15/06	Bank Erosion	Ongoing		2007	Waiting on SCE to be completed	to be determined		Waiting on SCE completion, 2007									
US Moorings	1841	6.2	8010 NW St Helens Rd.	EPA lead; Kristine Koch	AOC	RI	03/15/06	Groundwater	Ongoing		2007	Waiting on SCE to be completed	to be determined		Waiting on SCE completion, 2007									
US Moorings	1841	6.2	8010 NW St Helens Rd.	EPA lead; Kristine Koch	AOC	RI	03/15/06	Stormwater	Ongoing		2007	Waiting on SCE to be completed	to be determined		Waiting on SCE completion, 2007									
US Moorings	1841	6.2	8010 NW St Helens Rd.	EPA lead; Kristine Koch	AOC	RI	03/15/06	Overwater Activities	Ongoing		2007	Waiting on SCE to be completed	to be determined		Waiting on SCE completion, 2007									
US Moorings	1841	6.2	8010 NW St Helens Rd.	EPA lead; Kristine Koch	AOC	RI	03/15/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site Information					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site name	ECM #	River mile	Address	DEQ PM	Type of agreement (directly source)	Project status	Date MMR modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Site priority level	Status of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM activities completed to date (m-y)	Status of EPA review of contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	Date SCM completed (m-y)	Status of EPA review of completed SCM	Operation and maintenance requirements		
												Pathway determination	Pathway priority level													
Crawford Street Corp	2363	0.3 E	84248 N Crawford	Tom Gahner	PH Letter Agr for XPA (1/1/99)	XPA	03/08/06	Overland Transport/Sheet Flow	Ongoing	See Stormwater Pathway	No current schedule	Waiting on SCE to be completed	to be determined	to be determined	Waiting on SCE completion											
Crawford Street Corp	2363	0.3 E	84248 N Crawford	Tom Gahner	PH Letter Agr for XPA (1/1/99)	XPA	03/08/06	Bank Erosion	Ongoing	To be determined	No current schedule	Waiting on SCE to be completed	to be determined	to be determined	To be determined		RP removed black sand from beach and bank in 10/01. Residual contamination exists on beach. Bank was replaced with clean fill.									
Crawford Street Corp	2363	0.3 E	84248 N Crawford	Tom Gahner	PH Letter Agr for XPA (1/1/99)	XPA	03/08/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE completion											
Crawford Street Corp	2363	0.3 E	84248 N Crawford	Tom Gahner	PH Letter Agr for XPA (1/1/99)	XPA	03/08/06	Stormwater	Ongoing	Additional monitoring needed	No current schedule	Waiting on SCE to be completed	to be determined		Waiting on SCE completion											
Crawford Street Corp	2363	0.3 E	84248 N Crawford	Tom Gahner	PH Letter Agr for XPA (1/1/99)	XPA	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Crawford Street Corp	2363	0.3 E	84248 N Crawford	Tom Gahner	PH Letter Agr for XPA (1/1/99)	XPA	03/08/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Gasco (NW Natural)	84	0.4 W	7900 NW St Helena	Held Blackie	Pre-Ph VCP Agr for R/F/S (8/94)	RI	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Gasco (NW Natural)	84	0.4 W	7900 NW St Helena	Held Blackie	Pre-Ph VCP Agr for R/F/S (8/94)	RI	03/08/06	Bank Erosion	Ongoing	Coordinate Bank Source Control with anticipated in-water action	To be determined	Pathway is complete	p High		Waiting on SCE to be completed.											
Gasco (NW Natural)	84	0.4 W	7900 NW St Helena	Held Blackie	Pre-Ph VCP Agr for R/F/S (8/94)	RI	03/08/06	Groundwater	Completed			Pathway is complete	High		Waiting on SCE to be completed.	Field Pilot 2006/Source Control Alternatives Evaluation March 2007										
Gasco (NW Natural)	84	0.4 W	7900 NW St Helena	Held Blackie	Pre-Ph VCP Agr for R/F/S (8/94)	RI	03/08/06	Stormwater	Ongoing	Complete stormwater system evaluation and sampling	Winter 2008	Pathway is complete	to be determined		Waiting on SCE to be completed											
Gasco (NW Natural)	84	0.4 W	7900 NW St Helena	Held Blackie	Pre-Ph VCP Agr for R/F/S (8/94)	RI	03/08/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to GERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Gasco (NW Natural)	84	0.4 W	7900 NW St Helena	Held Blackie	Pre-Ph VCP Agr for R/F/S (8/94)	RI	03/08/06	Other NPDES Permit	Ongoing	Review draft permit standards	July 2008	Pathway is complete	to be determined		Waiting on SCE to be completed.											
Gasco/Silbrico Corp	183	0.6 W	7700 NW Front	Held Blackie	Joint Order NW Natural and Wackar Silbrico (10/00)	RI	03/13/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Gasco/Silbrico Corp	183	0.6 W	7700 NW Front	Held Blackie	Joint Order NW Natural and Wackar Silbrico (10/00)	RI	03/13/06	Bank Erosion	Ongoing	Additional investigation and assessment	Winter 2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed											
Gasco/Silbrico Corp	183	0.6 W	7700 NW Front	Held Blackie	Joint Order NW Natural and Wackar Silbrico (10/00)	RI	03/13/06	Groundwater	Completed	Upland evaluation for manufactured gas plant waste is ongoing to support SCM alternatives evaluation		Pathway is complete	High		Waiting on SCE to be completed	Field Pilot 2006/Source Control Alternatives Evaluation March 2007										
Gasco/Silbrico Corp	183	0.6 W	7700 NW Front	Held Blackie	Joint Order NW Natural and Wackar Silbrico (10/00)	RI	03/13/06	Stormwater	Ongoing	Complete formal analysis of sampling results	Fall 2008	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed, 2008											
Gasco/Silbrico Corp	183	0.6 W	7700 NW Front	Held Blackie	Joint Order NW Natural and Wackar Silbrico (10/00)	RI	03/13/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Gasco/Silbrico Corp	183	0.6 W	7700 NW Front	Held Blackie	Joint Order NW Natural and Wackar Silbrico (10/00)	RI	03/13/06	Other NPDES Permit	Ongoing	Deane creek investigation ongoing	Summer 2008	Pathway is complete	p Med		Waiting on SCE to be completed, 2008											

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected <b>SOURCES</b> of contamination to the river					Source Control Evaluation (SCE)							Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)													
Site Information					Type of agreement/directive source	Project status	DEQ last modified (m-d-y)	PSS/SCS contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed			Project status		Status of EPA review of SCE decision	Source Control alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM Revisions completed to date (m-y)	Status of Volume of contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	Status of EPA review of completed SCM	Upstream end maintenance measurements
Site name	ECR #	River mile	Address	DEQ PM								Pathway determination	Pathway priority level	Site priority level											
Qasco/Stron c Corp	183	8.5 W	7200 NW Front	Haid Blachie	Joint Order issued to NW Natural and Wacker Sironic (1000)	RI	03/13/06	Other - NPDES (p-1116)	Completed			Pathway is complete	Low		Waiting on SCE to be completed, 2006										
Sironic Corp TCE Investigation	183	8.5 W	7200 NW Front	Dana Bayuk	VCP Order (204)	RI	03/07/06	Overland Transport/Sheet Flow	N/A	N/A, subsurface releases from UST system	N/A	N/A	none	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sironic Corp TCE Investigation	183	8.5 W	7200 NW Front	Dana Bayuk	VCP Order (204)	RI	03/07/06	Bank Erosion	N/A	N/A, subsurface releases from UST system	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sironic Corp TCE Investigation	183	8.5 W	7200 NW Front	Dana Bayuk	VCP Order (204)	RI	03/07/06	Groundwater	Ongoing	Continued groundwater monitoring	Complete RI, prepare source control decision, 2006	Pathway is complete	p High		Waiting on SCE to be completed	Enhanced bioremediation pilot study in preliminary planning phase									
Sironic Corp TCE Investigation	183	8.5 W	7200 NW Front	Dana Bayuk	VCP Order (204)	RI	03/07/06	Stormwater	Ongoing	Site storm water system evaluation, including data compilation & sampling in and around piping	2006	Contaminated five sediments near northern facility outfall (Area 2)	to be determined		Waiting on SCE to be completed										
Sironic Corp TCE Investigation	183	8.5 W	7200 NW Front	Dana Bayuk	VCP Order (204)	RI	03/07/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sironic Corp TCE Investigation	183	8.5 W	7200 NW Front	Dana Bayuk	VCP Order (204)	RI	03/07/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Wilamette Cove	2068	8.8 E	Foot of N Edgewater	Kevin Perrett	PH Agr for R/SCM (1100)	RI	03/09/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway, no actions recommended	Low	to be determined	Waiting on SCE to be completed, spring 2006										
Wilamette Cove	2068	8.8 E	Foot of N Edgewater	Kevin Perrett	PH Agr for R/SCM (1100)	RI	03/09/06	Bank Erosion	Ongoing	Complete bank sampling	Spring 2006	Suspected migration pathway	to be determined		Waiting on SCE to be completed, spring 2006										
Wilamette Cove	2068	8.8 E	Foot of N Edgewater	Kevin Perrett	PH Agr for R/SCM (1100)	RI	03/09/06	Groundwater	Ongoing	Continue groundwater monitoring	Spring 2006	Suspected migration pathway	to be determined		Waiting on SCE to be completed, spring 2006										
Wilamette Cove	2068	8.8 E	Foot of N Edgewater	Kevin Perrett	PH Agr for R/SCM (1100)	RI	03/09/06	Stormwater	Ongoing	Evaluate potential on-site storm drains	2006	Suspected migration pathway	to be determined		Waiting on SCE to be completed, spring 2006										
Wilamette Cove	2068	8.8 E	Foot of N Edgewater	Kevin Perrett	PH Agr for R/SCM (1100)	RI	03/09/06	Overwater Activities	N/A	N/A	N/A	No current source, likely historic source	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Wilamette Cove	2068	8.8 E	Foot of N Edgewater	Kevin Perrett	PH Agr for R/SCM (1100)	RI	03/09/06	Other - In river (NPDES # 111111)	Completed			Suspected migration pathway	Medium		EPA reviewed and commented	alternatives evaluation completed 2004	Source removal completed in river 10/2004	deferred to in-water RI							
Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Rold	Pre-PH Order for RI (1999)	RI	03/07/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Rold	Pre-PH Order for RI (1999)	RI	03/07/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Rold	Pre-PH Order for RI (1999)	RI	03/07/06	Groundwater (dume discharge to river)	Ongoing	SCE Technical Memorandum to be submitted	SCE Technical Memorandum due 5/06	Pathway is complete	p High		Waiting on SCE to be completed, spring 2006										
Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Rold	Pre-PH Order for RI (1999)	RI	03/07/06	Groundwater (dume discharge to City Outfall 225)	Completed			Pathway is complete	High			Interim SCM to seal storm water line to prevent infiltration									
Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Rold	Pre-PH Order for RI (1999)	RI	03/07/06	Stormwater	Ongoing	City Outfall 225 & 22C storm drain evaluations	Pending GW SCM for 225	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed, spring 2006										
Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Rold	Pre-PH Order for RI (1999)	RI	03/07/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Rold	Pre-PH Order for RI (1999)	RI	03/07/06	Other - historical drainage ditch	Ongoing	Complete remedial investigation	SCE Technical Memorandum due 5/06	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed, spring 2006										

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river				Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site Information				Project status										SCM Status											
Site name	ECRI #	Row mile	Address	DEQ P#	Type of agreement/directive source	Project status	DEQ last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed			SCM review of SCE decision	Selected SCMs	Status of EPA review of SCM selection decision	SCM reviewed/ completed to date (m-y)	Major or volume of constraints identified	Proposed SCM activities to be done and schedule (m-y)	DEQ SCE completed (m-y)	Status of EPA review of completed SCM	Operation and maintenance requirements		
												Pathway determination	Pathway priority level	Site priority level											
Rhone Poulenc	156	6.9 W	6200 NW St Helens	Tom Rolak	Pre-PH Order for RI (1999)	RI	03/07/06	Other - current NPDES permitted discharge	Ongoing	To be determined	No current schedule	Waiting on SCE to be completed	To be determined		Waiting on SCE to be completed										
McCormick & Bader	74	7	6900 N Edgewater Street	Kevin Parrett	Superfund agreement with EPA	remedy implementation	03/09/06	Overland Transport/Sheet Flow	Completed			Pathway is complete	High	High	Complete	contaminated soil removal, sheet-pile barrier wall, sediment cap, riprap soil cap, upland soil cap, concrete extraction		all SCMs have been implemented	6,000 gallons of concrete recovered from groundwater, 33,000 tons of contaminated soil and debris removed, 23 acres of contaminated sediment capped, 8 acres of contaminated bank soil capped, 35 acres of contaminated upland soil capped			EPA reviewed and commented	periodic inspection and maintenance, effectiveness monitoring, site use restrictions		
McCormick & Bader	74	7	6900 N Edgewater Street	Kevin Parrett	Superfund agreement with EPA	remedy implementation	03/09/06	Bank Erosion	Completed			Pathway is complete	High		Complete							EPA reviewed and commented			
McCormick & Bader	74	7	6900 N Edgewater Street	Kevin Parrett	Superfund agreement with EPA	remedy implementation	03/09/06	Groundwater	Completed			Pathway is complete	High		Complete							EPA reviewed and commented			
McCormick & Bader	74	7	6900 N Edgewater Street	Kevin Parrett	Superfund agreement with EPA	remedy implementation	03/09/06	Stormwater	Completed			Pathway is complete	High		Complete							EPA reviewed and commented			
McCormick & Bader	74	7	6900 N Edgewater Street	Kevin Parrett	Superfund agreement with EPA	remedy implementation	03/09/06	Overwater Activities	Completed			Pathway is complete	High		Complete							EPA reviewed and commented			
McCormick & Bader	74	7	6900 N Edgewater Street	Kevin Parrett	Superfund agreement with EPA	remedy implementation	03/09/06	Other	N/A			N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Koppers Inc	2348	7	7540 NW St Helens Rd.	Held Blacklie	Part of NW Natural Geo site; see ECRI #64			Overland Transport/Sheet Flow																	
Koppers Inc	2348	7	7540 NW St Helens Rd.	Held Blacklie				Bank Erosion																	
Koppers Inc	2348	7	7540 NW St Helens Rd.	Held Blacklie				Groundwater																	
Koppers Inc	2348	7	7540 NW St Helens Rd.	Held Blacklie				Stormwater																	
Koppers Inc	2348	7	7540 NW St Helens Rd.	Held Blacklie				Overwater Activities																	
Koppers Inc	2348	7	7540 NW St Helens Rd.	Held Blacklie				Other																	
Akama	308	7.2 W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Ag for RI/FS (1998)	RI	03/06/06	Groundwater (Vapor intrusion DDT Plume)	Ongoing	Source control evaluation in preparation	2006	Pathway is complete	p High	p High	Waiting on SCE completion	schedule for completing draft evaluation report, fall 2007	Final SCM TBD Interim SCM AS/VS system in-situ chemical oxidation	EPA reviewed and commented on Interim SCM (April 2006)	Interim SCMs include AS/VS system, initiated in-situ chemical treatment						
Akama	308	7.2 W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Ag for RI/FS (1998)	RI	03/06/06	Groundwater (Vapor intrusion DDT Plume)	Ongoing	Source control evaluation in preparation	2006	Pathway is complete	p High	p High	Waiting on SCE completion	schedule for completing draft evaluation report, fall 2007	Final SCM TBD Interim SCM in-situ calcium polysulfide treatment underway	EPA reviewed and commented on Interim SCM (April 2006)	Interim SCMs include in-situ calcium polysulfide treatment						
Akama	308	7.2 W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Ag for RI/FS (1998)	RI	03/06/06	Groundwater (Vapor intrusion DDT Plume)	Ongoing	Source control evaluation in preparation	2006	Pathway is complete	p High	p High	Waiting on SCE completion	schedule for completing draft evaluation report, fall 2007	Final SCM TBD proposed field pilot expected early 08		None						
Akama	308	7.2 W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Ag for RI/FS (1998)	RI	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Akama	308	7.2 W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Ag for RI/FS (1998)	RI	03/06/06	Bank Erosion	Ongoing	define boundaries of contaminated bank material	To be determined	River Bank soil contaminant levels exceed action levels	p High		Anticipate integrating with EPA In-situ early action process	schedule for completing draft evaluation report 09/07	Timing of SCM to be coordinated with EPA early action		None						
Akama	308	7.2 W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Ag for RI/FS (1998)	RI	03/06/06	Stormwater	Ongoing	Evaluate existing sampling data	2006	Contaminants in stormwater exceed screening values (AWQC)	p High		EPA review deferred to review of selected SCM	schedule for completing draft evaluation report 05/06	Final SCMs to be determined		Interim SCMs include BMPs, surface soil removals and surface soil caps						
Akama	308	7.2 W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Ag for RI/FS (1998)	RI	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		

# DEQ Milestone Report Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

3/24/2008

Shading indicates that upland source control work has been completed

Confirmed or suspected Sources of contamination to the river				Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site Information				Project status										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site name	ECB #	River mile	Address	DEQ PM	Type of agreement directing source	Project status	DEQ staff notified (m-d-y)	POTENTIAL contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		STATUS OF EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	STATUS OF EPA review of SCM selection decision	SCM schedule completed to date (m-y)	STATUS OF VULNERABILITY assessment of SCMs	PROPOSED SCD activities to be done and schedule (m-y)	DEQ SCM completed (m-y)	STATUS OF EPA review of completed SCM	UPSTREAM MAINTENANCE requirements
												Pathway determination	Pathway priority level	Site priority level									
Adams	398	7.2 W	5400 NW Front	Matt McKinley	Pre-PH VCP Formal Ag for RIFS (8/98)	RI	03/06/06	Other	N/A	N/A	N/A	N/A	none	1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
McCall 08	134	7.4 W	5550 NW Front	Tom Gahner	PH Ag for RUCSM (3/00)	RI	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
McCall 08	134	7.4 W	5550 NW Front	Tom Gahner	PH Ag for RUCSM (3/00)	RI	03/06/06	Bank Erosion	Ongoing	RP is conducting RI to determine if SCMs are needed on the bank.	RI to be completed in 2008	Preliminary determination that pathway is insignificant	p Low	Waiting on SCE to be completed.									
McCall 08	134	7.4 W	5550 NW Front	Tom Gahner	PH Ag for RUCSM (3/00)	RI	03/06/06	Groundwater	Ongoing	Continue ge monitoring to evaluate short-term concentrations	2008	Waiting on SCE to be completed	to be determined	Waiting on SCE to be completed.									
McCall 08	134	7.4 W	5560 NW Front	Tom Gahner	PH Ag for RUCSM (3/00)	RI	03/06/06	Stormwater	Ongoing	RP is conducting RI to determine if SCA is needed	2008	Waiting on SCE to be completed	to be determined	Waiting on SCE to be completed.									
McCall 08	134	7.4 W	5560 NW Front	Tom Gahner	PH Ag for RUCSM (3/00)	RI	03/06/06	Overwater Activities	N/A	N/A	N/A	No known current source (apls reported to OERS)	none	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
McCall 08	134	7.4 W	5560 NW Front	Tom Gahner	PH Ag for RUCSM (3/00)	RI	03/06/06	Other	N/A	N/A	N/A	N/A	none	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OS Roofing	117	7.3 W	6350 NW Front	Mike Romero	VCP - PH Ag Pending	XPA	03/06/06	Overland Transport/Sheet Flow	Ongoing	XPA complete, RI and SCE to be initiated	SOW under development, due 2008	Waiting on SCE to be completed	to be determined	to be determined	Waiting on SCE to be completed.								
OS Roofing	117	7.6 W	6350 NW Front	Mike Romero	VCP - PH Ag Pending	XPA	03/06/06	Bank Erosion	Ongoing	XPA complete, RI and SCE to be initiated in RI	SOW under development, due 2008	Waiting on SCE to be completed	to be determined	Waiting on SCE to be completed.									
OS Roofing	117	7.5 W	6350 NW Front	Mike Romero	VCP - PH Ag Pending	XPA	03/06/06	Groundwater	Ongoing	XPA complete, RI and SCE to be initiated	SOW under development, due 2008	Waiting on SCE to be completed	to be determined	Waiting on SCE to be completed.									
OS Roofing	117	7.5 W	6350 NW Front	Mike Romero	VCP - PH Ag Pending	XPA	03/06/06	Stormwater	Ongoing	XPA complete, RI and SCE to be initiated	SOW under development, due 2008	Waiting on SCE to be completed	to be determined	Waiting on SCE to be completed.									
OS Roofing	117	7.3 W	6350 NW Front	Mike Romero	VCP - PH Ag Pending	XPA	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OS Roofing	117	7.5 W	6350 NW Front	Mike Romero	VCP - PH Ag Pending	XPA	03/06/06	Other	N/A	N/A	N/A	N/A	none	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Triangle Park (N PDY Yard)	277	7.5 E	5828 N Van Houten	Jim Anderson	Pre-PH PPA for RIFS (5/97)	RD / RA	03/10/06	Overland Transport/Sheet Flow	Completed			Contaminated soil entrained in stormwater & sheetflow	Medium	to be determined	EPA reviewed and commented	alternatives evaluation completed, 12/2004	-Dig & haul soil hot spots & ICON/ECON soil cleanup anticipated to be initiated in '07 after property sale	Proposed SCM to EPA 9/04; Received comments 12/04; DEQ responded to comments 2/05	SCMs anticipated to be initiated after pending property transaction is complete (2007)	Estimated 820cy of soil will be removed & 5,100cy of surface capped	-Dig & haul soil hot spots & ICON/ECON soil cleanup anticipated to be initiated in '07 after property sale		
Triangle Park (N PDY Yard)	277	7.5 E	5828 N Van Houten	Jim Anderson	Pre-PH PPA for RIFS (5/97)	FS	03/10/06	Bank Erosion	Completed			Contaminated soil entrained in stormwater & sheetflow	Medium	to be determined	EPA reviewed and commented	alternatives evaluation completed, 12/2004	-Dig & haul soil hot spots & ICON/ECON soil cleanup anticipated to be initiated in '07 after property sale	Proposed SCM to EPA 9/04; Received comments 12/04; DEQ responded to comments 2/05	SCMs anticipated to be initiated after pending property transaction is complete (2007)	A portion of the estimated 820cy of soil to be removed & 5,100cy of surface capped is in the bank area	-Dig & haul soil hot spots & ICON/ECON soil cleanup anticipated to be initiated in '07 after property sale		
Triangle Park (N PDY Yard)	277	7.5 E	5828 N Van Houten	Dana Beyak	DEQ Lead (Orphan Account)	RI	03/10/06	Groundwater	Ongoing	Prepare source control decision document	May 2008	Pathway is complete	to be determined	Waiting on SCE completion								N/A	
Triangle Park (N PDY Yard)	277	7.6 E	5828 N Van Houten	Jim Anderson	Pre-PH PPA for RIFS (5/97)	FS	03/10/06	Stormwater	Completed			Contaminated soil entrained in stormwater & sheetflow	Medium	to be determined	EPA reviewed and commented, 12/2004	alternatives evaluation completed, 12/2004	-Dig & haul soil hot spots & ICON/ECON soil cleanup anticipated to be initiated in '07 after property sale	EPA review completed 12/04	SCMs anticipated to be initiated after pending property transaction is complete (2007)	A portion of the estimated 820cy of soil to be removed & 5,100cy of surface capped is in the bank area	-Dig & haul soil hot spots & ICON/ECON soil cleanup anticipated to be initiated in '07 after property sale	Proposed SCD to EPA 9/04; Received comments 12/04; DEQ responded to comments 2/05.	
Triangle Park (N PDY Yard)	277	7.5 E	5828 N Van Houten	Jim Anderson	Pre-PH PPA for RIFS (5/97)	FS	03/10/06	Overwater Activities	N/A			No current on-site activities	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2006

**EXPLANATION** - Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site Information					Source Control Evaluation (SCE)										Project status											
Site name	ECR #	River mile	Address	DEQ PM	TYPE of agreement/ directive source	Project status	DATE last modified (m-d-y)	POSSIBLE contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed			STATUS of EPA review of SCE decision	SCMs (SCMs) alternatives evaluation and schedule (m-y)	Selected SCMs	STATUS of EPA review of SCE selection decision	SCM SCHEDULE completed to date (m-y)	STATUS of current SCMs	PROPOSED SCM activities to be done and schedule (m-y)	DATE SCM completed (m-y)	STATUS of EPA review of completed SCM	OPTIONAL and maintenance requirements		
												Pathway determination	Pathway priority level	Site priority level												
Triangle Park (N PDX Yard)	277	7.5 E	5828 N Van Houten	Jim Anderson	Pre-PH PPA for R/VFS (5/97)	FS	03/10/06	Other - Petroleum pipeline enters at south end of site from beneath the river	Completed			Insignificant pathway; no actions recommended	Low		EPA reviewed and commented											
Gould Electronics, Inc aka GA-TEK	40	7.5W	3309 NW 51st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	p-High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Gould Electronics, Inc aka GA-TEK	40	7.5W	3309 NW 51st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Gould Electronics, Inc aka GA-TEK	40	7.5W	3309 NW 51st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low		EPA issued groundwater NFA based upon risk assessment		No SCM needed					EPA lead				
Gould Electronics, Inc aka GA-TEK	40	7.5W	3309 NW 51st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Groundwater/City Storm Sewer	Ongoing	TSD, storm sewer appears to be preferential pathway for contaminant migration	to be determined	Pathway is complete	p-High		EPA lead											
Gould Electronics, Inc aka GA-TEK	40	7.5W	3309 NW 51st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Stormwater	Completed			Historically pathway existed. Current discharge insignificant pathway; no actions recommended	Low		EPA lead		1) Contaminated soil removal and containment (landfill); 2) Sediment removal; 3) RCRA waste containment; 4) Removed waste pond 5) O&M ongoing					EPA lead				
Gould Electronics, Inc aka GA-TEK	40	7.5W	3309 NW 51st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Gould Electronics, Inc aka GA-TEK	40	7.5W	3309 NW 51st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Other - Historic and Current NPOES permit	Completed			Historically pathway existed. Current discharge insignificant pathway; no actions recommended	Low		EPA lead		Removed waste pond (East Doane Lake); O&M ongoing					EPA lead				
Willbridge (Rider Morgan, Chevron, Conoco Phillips)	1549	7.7 W	Front Ave & NW Doane	Jill Kierman	Pre-PH Consent Order (3/94)	FS	03/14/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	High	Submitted to EPA fall 2004; no comments		No SCM needed						N/A			
Willbridge (Rider Morgan, Chevron, Conoco Phillips)	1549	7.7 W	Front Ave & NW Doane	Jill Kierman	Pre-PH Consent Order (3/94)	FS	03/14/06	Bank Erosion	Completed			Insignificant pathway; no actions recommended	Low		Submitted to EPA fall 2004; no comments		No SCM needed						N/A			
Willbridge (Rider Morgan, Chevron, Conoco Phillips)	1549	7.7 W	Front Ave & NW Doane	Jill Kierman	Pre-PH Consent Order (3/94)	FS	03/14/06	Groundwater	Completed			GW suspected migration pathway	High		Submitted to EPA fall 2004; no comments	no alternatives evaluation needed	Product recovery & hydraulic containment (sheet pile wall)	Proposed SCM submitted to EPA fall 2004; no comments	hydraulic containment and treatment		containment system to be installed in summer 2008					
Willbridge (Rider Morgan, Chevron, Conoco Phillips)	1549	7.7 W	Front Ave & NW Doane	Jill Kierman	Pre-PH Consent Order (3/94)	FS	03/14/06	Stormwater	Ongoing	Apply stormwater guidance to assess pathway	Fall 2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed											
Willbridge (Rider Morgan, Chevron, Conoco Phillips)	1549	7.7 W	Front Ave & NW Doane	Jill Kierman	Pre-PH Consent Order (3/94)	FS	03/14/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		

# DEQ Milestone Report Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)								Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)												
Site Information					Source Control Evaluation (SCE)								Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)												
Site name	ECR #	River mile	Address	DEQ PM	Type of agreement directive source	Project status	DEQ last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Project status		STATUS OF EPA review of SCE decision	SCM CONSIDERATION alternative evaluation and schedule (m-y)	Selected SCMs	STATUS OF EPA review of SCD selection decision	SCM REVIEW completed to date (m-y)	STATUS OF SOURCE CONTROL CONTAMINANTS controlled	PROPOSED SCM activities to be done and schedule (m-y)	DEQ SCM completed (m-y)	STATUS OF EPA review of completed SCM	COMPLETION AND maintenance requirements
												Pathway determination	Pathway priority level	Site priority level											
Wetbridge (Kinder Morgan, Chevron, Conoco Phillips)	1548	7.7 W	Front Ave & NW Doane	JB Korman	Pre-PH Consent Order (2004)	FS	03/14/08	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chevron Asphalt	1281	8.0 W	3501 NW Front	Mark Pugh	PH Letter Agr for XPA (1/03)	XPA	03/03/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	N/A	p Med	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chevron Asphalt	1281	8.0 W	3501 NW Front	Mark Pugh	PH Letter Agr for XPA (1/03)	XPA	03/03/08	Bank Erosion	N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chevron Asphalt	1281	8.0 W	3501 NW Front	Mark Pugh	PH Letter Agr for XPA (1/03)	XPA	03/03/08	Groundwater	Ongoing	XPA feedback complete; DEQ provided comments for source control screening; revised report due spring 2008	spring 2007	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed.										
Chevron Asphalt	1281	8.0 W	3501 NW Front	Mark Pugh	PH Letter Agr for XPA (1/03)	XPA	03/03/08	Stormwater	Ongoing	XPA feedback complete; DEQ provided comments for source control screening; revised report due spring 2008	spring 2007	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed.										
Chevron Asphalt	1281	8.0 W	3501 NW Front	Mark Pugh	PH Letter Agr for XPA (1/03)	XPA	03/03/08	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chevron Asphalt	1281	8.0 W	3501 NW Front	Mark Pugh	PH Letter Agr for XPA (1/03)	XPA	03/03/08	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Front Ave LP	1230	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/08	Overland Transport/Sheet Flow	Ongoing	Conducting XPA	2008	Waiting on SCE to be completed	to be determined	to be determined	Waiting on SCE to be completed.										
Front Ave LP	1230	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/08	Bank Erosion	Ongoing	Conducting XPA	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed.										
Front Ave LP	1230	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/08	Groundwater	Ongoing	Conducting XPA	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed.										
Front Ave LP	1230	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/08	Stormwater	Ongoing	Conducting XPA, additional sampling needed	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed.										
Front Ave LP	1230	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/08	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Front Ave LP	1230	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/08	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Glacier Northwest Inc.	2378		5034 NW Front Ave	Mike Romero	Part of Front Ave LP site, see ESC #1230			Overland Transport/Sheet Flow																	
Glacier Northwest Inc.	2378		5034 NW Front Ave	Mike Romero				Bank Erosion																	
Glacier Northwest Inc.	2378		5034 NW Front Ave	Mike Romero				Groundwater																	
Glacier Northwest Inc.	2378		5034 NW Front Ave	Mike Romero				Stormwater																	
Glacier Northwest Inc.	2378		5034 NW Front Ave	Mike Romero				Overwater Activities																	
Glacier Northwest Inc.	2378		5034 NW Front Ave	Mike Romero				Other																	
USCO	1338	8.2 E	6787 N Basin Ave.	Tom Gahner	VCP Letter Agr (2/04)	RI	03/06/08	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	to be determined	Waiting on SCE to be completed, Winter 2008										
USCO	1338	8.2 E	6787 N Basin Ave.	Tom Gahner	VCP Letter Agr (2/04)	RI	03/06/08	Bank Erosion	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE to be completed, Winter 2008										
USCO	1338	8.2 E	6787 N Basin Ave.	Tom Gahner	VCP Letter Agr (2/04)	RI	03/06/08	Groundwater	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE to be completed, Winter 2008										
USCO	1338	8.2 E	6787 N Basin Ave.	Tom Gahner	VCP Letter Agr (2/04)	RI	03/06/08	Stormwater	Ongoing	Sampling stormwater system	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed, Winter 2008										

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site Information					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)											
Site name	ECB #	River mile	Address	DEQ PM	Type of agreement/ discharge source	Project status	DATE last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed	Pathway determination	Pathway priority level	Site priority level	Status of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM activities completed to date (m-y)	Extent of volume of contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	DATE SCM completed (m-y)	Status of EPA review of selected SCM	Operation and maintenance requirements	
USCO	1338	8.2 E	8787 N Bush Ave.	Tom Gether	VCP Letter Agr (2/04)	RI	03/09/06	Overwater Activities	Ongoing	Evaluate dock activities	2006	Waiting on SCE to be completed	to be determined			Waiting on SCE to be completed Winter 2006										
USCO	1338	8.2 E	8787 N Bush Ave.	Tom Gether	VCP Letter Agr (2/04)	RI	03/09/06	Other	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fred Devine	2365	8.3 E	6211 N Ensign	Mark Pugh	No Agr	XPA	03/03/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low		p Med	Waiting on SCE completion										
Fred Devine	2365	8.3 E	6211 N Ensign	Mark Pugh	No Agr	XPA	03/03/06	Bank Erosion	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fred Devine	2365	8.3 E	6211 N Ensign	Mark Pugh	No Agr	XPA	03/03/06	Groundwater	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fred Devine	2365	8.3 E	6211 N Ensign	Mark Pugh	No Agr	XPA	03/03/06	Stormwater	Ongoing	negotiate agreement or issue order to conduct stormwater SCE	negotiate agreement or issue order by 8/2006, complete SCE early 2007	Waiting on SCE to be completed			p Med	Waiting on SCE to be completed										
Fred Devine	2365	8.3 E	6211 N Ensign	Mark Pugh	No Agr	XPA	03/03/06	Overwater Activities	N/A	N/A	N/A	No known current sources (as reported to GERS)	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fred Devine	2365	8.3 E	6211 N Ensign	Mark Pugh	No Agr	XPA	03/03/06	Other	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Freightliner Truck Plant	2366	8.4 E	6636 N Fathom	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none		to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Freightliner Truck Plant	2366	8.4 E	6636 N Fathom	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Bank Erosion	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Freightliner Truck Plant	2366	8.4 E	6636 N Fathom	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Groundwater	Ongoing	determine nature and extent of VOC plume	SOW under development, due 2006	Waiting on SCE to be completed	to be determined			Waiting on SCE to be completed										
Freightliner Truck Plant	2366	8.4 E	6636 N Fathom	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Stormwater	Ongoing	SW exclusion needed	SOW under development, due spring 2006	Waiting on SCE to be completed	to be determined			Waiting on SCE to be completed			RP voluntarily applying SW engineering controls on Ensign Street Outfall, coating metal roof							
Freightliner Truck Plant	2366	8.4 E	6636 N Fathom	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Overwater Activities	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Freightliner Truck Plant	2366	8.4 E	6636 N Fathom	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Other	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lakeland Industries	2372	8.4 W	4850 NW Front	Bill Robertson	PH Letter Agr for XPA (3/02)	XPA	03/09/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none		to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

## 3/24/2006

T/

12

11



## 3/24/2008

Confirmed or suspected Sources of contamination to the river				Source Control Evaluation (SCE)							Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)														
Site Information				Type of agreement				Project status			Source Control			SCM			SCM			SCM					
Site name	ECRI #	River mile	Address	DEG PI	Type of agreement	Project status	Date last modified (m/d/y)	POB/PA/contaminant	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Baseline for determination that source control is needed	Pathway determination	Pathway priority level	Site priority level	STATUS of EPA review of SCE decision	SOURCE control alternatives evaluation and schedule (m/y)	Selected SCMs	STATUS of EPA review of SCM selection decision	SCM SCORING completed to date (m/y)	STATUS of VOLUNTARY SCMs implemented	PROPOSED SCMs activities to be done and schedule (m/y)	SCM SCORING completed (m/y)	STATUS of EPA review of completed SCMs	Operation and maintenance requirements
Shelton Transporters	2277	8.4 W	4800 NW Front	Mark Pugh	PH Letter Agr for XPA (2001)	N/A	03/02/06	Overwater Activities	Completed				no significant pathway, no actions recommended	Low				No SCM needed							
Shelton Transporters	2277	8.6 W	4800 NW Front	Mark Pugh	PH Letter Agr for XPA (2001)	N/A	03/02/06	Other	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cablest Metals	2484	8.5 W	4827 NW Front	Tom Galtier	PH Letter Agr for XPA (1971)	XPA	03/08/05	Overwater Transport/Storage	N/A	N/A	N/A	N/A	N/A	none	Medium			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cablest Metals	2484	8.5 W	4827 NW Front	Tom Galtier	PH Letter Agr for XPA (1971)	XPA	03/08/05	Bank Erosion	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cablest Metals	2484	8.5 W	4827 NW Front	Tom Galtier	PH Letter Agr for XPA (1971)	XPA	03/08/05	Groundwater	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cablest Metals	2484	8.5 W	4827 NW Front	Tom Galtier	PH Letter Agr for XPA (1971)	XPA	03/08/05	Stormwater	Completed				Pathway is complete	Medium				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cablest Metals	2484	8.6 W	4827 NW Front	Tom Galtier	PH Letter Agr for XPA (1971)	XPA	03/08/05	Overwater Activities	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cablest Metals	2484	8.5 W	4827 NW Front	Tom Galtier	PH Letter Agr for XPA (1971)	XPA	03/08/05	Other	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Yesso Product Pipeline	2117	8.7	4500 Block Front Ave.	Mark McClellan	PH Agr for RUSCM (800)	RI	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	N/A	none	p Low			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Yesso Product Pipeline	2117	8.7	4500 Block Front Ave.	Mark McClellan	PH Agr for RUSCM (800)	RI	03/06/06	Bank Erosion	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Yesso Product Pipeline	2117	8.7	4500 Block Front Ave.	Mark McClellan	PH Agr for RUSCM (800)	RI	03/06/06	Groundwater	Ongoing	RP needs to finalize RI and SCE report	Draft SCE expected early 2006	Waiting on SCE to be completed		p Low				Waiting for SCE to be completed							
Yesso Product Pipeline	2117	8.7	4500 Block Front Ave.	Mark McClellan	PH Agr for RUSCM (800)	RI	03/06/06	Stormwater	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Yesso Product Pipeline	2117	8.7	4500 Block Front Ave.	Mark McClellan	PH Agr for RUSCM (800)	RI	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Yesso Product Pipeline	2117	8.7	4500 Block Front Ave.	Mark McClellan	PH Agr for RUSCM (800)	RI	03/06/06	Other	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cantalar Recovery	4015	8.9 W	3800 NW Yoon	Mark McClellan	Pre-PH VCP Letter Agr for RUSCM (2004)	conditional NFA 2004	03/10/05	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	N/A	none	Medium			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cantalar Recovery	4015	8.9 W	3800 NW Yoon	Mark McClellan	Pre-PH VCP Letter Agr for RUSCM (2004)	conditional NFA 2004	03/10/05	Bank Erosion	N/A	N/A	N/A	N/A	N/A	none				N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cantalar Recovery	4015	8.9 W	3800 NW Yoon	Mark McClellan	Pre-PH VCP Letter Agr for RUSCM (2004)	conditional NFA 2004	03/10/0																		

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site Information					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site name	EC&I #	River mile	Address	DEQ PM	Type of agreement/directive source	Project status	DEQ last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Site priority level	Result of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM decisions completed to date (m-y)	Major voluntary or other controls implemented	Proposed SCM activities to be done and schedule (m-y)	SCM SCD completed (m-y)	Status of EPA review of completed SCM	Operation and maintenance requirements
												Pathway determination	Pathway priority level											
Christensen Oil	2425	8.9 W	3821 NW St Helens	Tom Gahner	VCP Letter Agr for PA (8/00)	XPA	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Christensen Oil	2425	8.9 W	3821 NW St Helens	Tom Gahner	VCP Letter Agr for PA (8/00)	XPA	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Christensen Oil	2425	8.9 W	3821 NW St Helens	Tom Gahner	VCP Letter Agr for PA (8/00)	XPA	03/08/06	Groundwater	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Christensen Oil	2425	8.9 W	3821 NW St Helens	Tom Gahner	VCP Letter Agr for PA (8/00)	XPA	03/08/06	Stormwater	Ongoing	Pending review of SW data. XPA mostly complete	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed; 2008	Storm water BMPs and floating catch basin sediment								
Christensen Oil	2425	8.9 W	3821 NW St Helens	Tom Gahner	VCP Letter Agr for PA (8/00)	XPA	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Christensen Oil	2425	8.9 W	3821 NW St Helens	Tom Gahner	VCP Letter Agr for PA (8/00)	XPA	03/08/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Texasco Terminal	169	8.9 W	3800 NW St Helens	Matt McClincy	PH Agr for RUSCM (8/00)	RI	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Texasco Terminal	169	8.9 W	3800 NW St Helens	Matt McClincy	PH Agr for RUSCM (8/00)	RI	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Texasco Terminal	169	8.9 W	3800 NW St Helens	Matt McClincy	PH Agr for RUSCM (8/00)	RI	03/08/06	Groundwater	Ongoing	RP needs to finalize RI and SCE report	Draft SCE expected early 2008	Waiting on SCE to be completed	p Low		Waiting for SCE to be completed									
Texasco Terminal	169	8.9 W	3800 NW St Helens	Matt McClincy	PH Agr for RUSCM (8/00)	RI	03/08/06	Stormwater	Ongoing	RP needs to finalize RI and SCE report	Draft SCE expected early 2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Texasco Terminal	169	8.9 W	3800 NW St Helens	Matt McClincy	PH Agr for RUSCM (8/00)	RI	03/08/06	Overwater Activities	N/A	N/A	N/A	No known current sources (as reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Texasco Terminal	169	8.9 W	3800 NW St Helens	Matt McClincy	PH Agr for RUSCM (8/00)	RI	03/08/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anderson Brothers Property	970	8.9	5275 & 5315 NW St Helens Rd	Bob Schwarz	ICP	RI	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anderson Brothers Property	970	8.9	5275 & 5315 NW St Helens Rd	Bob Schwarz	ICP	RI	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anderson Brothers Property	970	8.9	5275 & 5315 NW St Helens Rd	Bob Schwarz	ICP	RI	03/08/06	Groundwater	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anderson Brothers Property	970	8.9	5275 & 5315 NW St Helens Rd	Bob Schwarz	ICP	RI	03/08/06	Stormwater	Ongoing	Catch basin sampling and analysis in progress	No current schedule	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Anderson Brothers Property	970	8.9	5275 & 5315 NW St Helens Rd	Bob Schwarz	ICP	RI	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anderson Brothers Property	970	8.9	5275 & 5315 NW St Helens Rd	Bob Schwarz	ICP	RI	03/08/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Vanwater and Rogers	330	9	3650 NW Yacon Ave	EPA lead; Kristine Koch				Overland Transport/Sheet Flow																
Vanwater and Rogers	330	9	3650 NW Yacon Ave	EPA lead; Kristine Koch				Bank Erosion																
Vanwater and Rogers	330	9	3650 NW Yacon Ave	EPA lead; Kristine Koch				Groundwater																
Vanwater and Rogers	330	9	3650 NW Yacon Ave	EPA lead; Kristine Koch				Stormwater																
Vanwater and Rogers	330	9	3650 NW Yacon Ave	EPA lead; Kristine Koch				Overwater Activities																
Vanwater and Rogers	330	9	3650 NW Yacon Ave	EPA lead; Kristine Koch				Other																
Oulds Lake RR Yard	100	9.0 W	3500 NW Yacon Ave	Mike Romero	PH Agr for RUSCM (12/02)	RI	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oulds Lake RR Yard	100	9.0 W	3500 NW Yacon Ave	Mike Romero	PH Agr for RUSCM (12/02)	RI	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2006

**Legend:** = Shading Indicates that upland source control work has been completed.

Confirmed or suspected SOURCES of contamination to the river										Source Control Evaluation (SCE)					Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site Information				Type of agreement directed source	Project status	DEQ last modified (m-y)	POU/CM contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed			Project status	Status of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM activities completed to date (m-y)	Mean of Volatile or Contaminants controlled	Progress of SCM activities to be done and schedule (m-y)	DEQ last completed (m-y)	Status of EPA review of completed SCM	Completion and maintenance requirements
Site name	ECSI #	River info	Address	DEQ #							Pathway determination	Pathway priority level	Site priority level											
Outside Lake RR Yard	100	9.0 W	3500 NW Yeon	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Groundwater	Ongoing	GW Investigation ongoing in early stages	2006 Pre-RI report identified some sources. All SCE schedule to be determined	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Outside Lake RR Yard	100	9.0 W	3500 NW Yeon	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Stormwater	Ongoing	SW Investigation ongoing in early stages	2006 Pre-RI report identified some sources. All SCE schedule to be determined	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Outside Lake RR Yard	100	9.0 W	3600 NW Yeon	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Outside Lake RR Yard	100	9.0 W	3000 NW Yeon	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Overland Transport/Sheet Flow - Area 1	N/A	N/A, already paved and/or developed	N/A	N/A	none	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Overland Transport/Sheet Flow - Area 2	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Pathway is complete	p High		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Overland Transport/Sheet Flow - Area 3	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Pathway is complete	p High		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Bark Erosion - Area 1	Ongoing	Survey of erodible soils, follow-up sampling	No current schedule	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Bark Erosion - Area 2	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Pathway is complete	p High		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Bark Erosion - Area 3	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Pathway is complete	p High		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Overwater Activities - Area 3	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Groundwater - Area 1	Completed	N/A, SCE submitted to EPA February 2003, SCMs implemented	N/A	Groundwater is a complete pathway, VOC plume migrating to river.	p Med		EPA comments received 5/03	alternatives evaluation completed, EPA comments received 5/2003	Hydraulic containment and source removal	SCD submitted to EPA 3/2003, EPA comments received 5/2003	P&T and AS/SVE systems installed and operating	~20 lbs. of HVOCs removed as of 11/03	Assess downgradient capture of VOC plume on Lakeview Industries property, Schedule TSD			Quarterly performance monitoring and reporting
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Groundwater - Area 2	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Groundwater - Area 3	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Stormwater - Area 1	Ongoing	Complete, review and screen data	No current schedule	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Stormwater - Area 2	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Waiting on SCE to be completed	p High		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Stormwater - Area 3	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Waiting on SCE to be completed	p High		Waiting on SCE to be completed									
Gunderson	1155	9.0 W	4350 SW Front	Dana Bayuk	Pre-RI VCP Formal Agr for R/FS (1994)	RI	03/08/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Freightliner (Pasta Mfg Plant)	115	9.2 E	5400 N Beach	Mike Romero	PH Agr for R/SCM (12/02)	RI	03/09/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site Information					Project status										Project status									
Site name	ECR #	River mile	Address	DEQ PM	Type of agreement directing source	Project status	DEQ MTR modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Scale for determination that source control is needed		Site priority level	Status of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-y)	Selected SCMs	Status of EPA review of SCM selection decision	SCM schedule completed to date (m-y)	Risk of volume of contaminants controlled	Proposed SCM activities to be done and schedule (m-y)	Date SCM completed (m-y)	Status of EPA review of completed SCM	Operation and maintenance requirements
												Pathway determination	Pathway priority level											
Freightliner (Pars Mfg Plant)	115	9.2 E	5400 N Bash	Mike Romero	PH Agr for RUSCM (1202)	RI	03/09/06	Bank Erosion	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Freightliner (Pars Mfg Plant)	115	9.2 E	5400 N Bash	Mike Romero	PH Agr for RUSCM (1202)	RI	03/08/06	Groundwater	Ongoing	GW Investigation nearing completion	2008	Waiting on SCE to be completed	to be determined											
Freightliner (Pars Mfg Plant)	115	9.2 E	5400 N Bash	Mike Romero	PH Agr for RUSCM (1202)	RI	03/09/06	Stormwater	Ongoing	Additional stormwater sampling needed	SCM under development, due spring 2008	Waiting on SCE to be completed	to be determined											
Freightliner (Pars Mfg Plant)	115	9.2 E	5400 N Bash	Mike Romero	PH Agr for RUSCM (1202)	RI	03/09/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Freightliner (Pars Mfg Plant)	115	9.2 E	5400 N Bash	Mike Romero	PH Agr for RUSCM (1202)	RI	03/09/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Columbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Columbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Columbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/08/06	Groundwater	Not Started		No current schedule, pending PPA development	Waiting on SCE to be completed	to be determined											
Columbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/08/06	Stormwater	Not Started	Installation and sampling of storm drain	No current schedule, pending PPA development	Waiting on SCE to be completed	to be determined											
Columbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Columbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/08/06	Other	N/A	N/A	N/A	N/A	none	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GE Decommissioning	4003	9.5 W	2727 NW 28th	Tom Garner	PH Agr for XPA (104)	XPA	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GE Decommissioning	4003	9.5 W	2727 NW 28th	Tom Garner	PH Agr for XPA (104)	XPA	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GE Decommissioning	4003	9.5 W	2727 NW 28th	Tom Garner	PH Agr for XPA (104)	XPA	03/08/06	Groundwater	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GE Decommissioning	4003	9.5 W	2727 NW 28th	Tom Garner	PH Agr for XPA (104)	XPA	03/08/06	Stormwater	Ongoing	RP is continuing investigations to determine if SCM is needed	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed; summer 2008		Initiated removal of PCB contaminated sediment from on-site catch basins and pipes.							
GE Decommissioning	4003	9.5 W	2727 NW 28th	Tom Garner	PH Agr for XPA (104)	XPA	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Delvanco Company	1198	9.6 W	2406 NW 30th	Dane Bayuk	PH Agr for XPA (1003)	XPA	03/07/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Delvanco Company	1198	9.6 W	2406 NW 30th	Dane Bayuk	PH Agr for XPA (1003)	XPA	03/07/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Delvanco Company	1198	9.6 W	2406 NW 30th	Dane Bayuk	PH Agr for XPA (1003)	XPA	03/07/06	Groundwater	Ongoing	XPA complete, data being reviewed and analyzed	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed, (2008)									

## 3/24/2008

**20050117** = Shading indicates that upland source control work has been completed.

**DEQ Milestone Report**  
**Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor**

3/24/2008

\* Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site Information					Project status										Project status									
Site name	ECRI #	River mile	Address	DEQ PM	TYPE of agreement/decline source	Project status	DEQ last modified (m-d-y)	PARTICLE sedimentation	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed		Site priority level	STATUS of EPA review of SCE decision	Source Control alternatives evaluation and schedule (m-y)	Selected SCMs	STATUS of EPA review of SCD selection decision	SCMs/SCMs completed to date (m-y)	STATUS of VOLUNTARY commitments controlled	PROPOSED SCD activities to be done and schedule (m-y)	DATE SCD completed (m-y)	STATUS of EPA review of completed SCD	OPERATION AND maintenance requirements
												Pathway determination	Pathway priority level											
UPRR Abline	178	10.3 E	2145 N Interstate	Mike Romero	PH Agr for RUSCM (3/02)	RI	03/08/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PGE Substation E	3878	10.4	2835 NW Front Ave.	Tom Gahner	VCP	XPA	03/02/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	Low	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PGE Substation E	3878	10.4	2835 NW Front Ave.	Tom Gahner	VCP	XPA	03/02/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PGE Substation E	3878	10.4	2835 NW Front Ave.	Tom Gahner	VCP	XPA	03/02/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low		SCE submitted to EPA for review 3/22/08									
PGE Substation E	3878	10.4	2835 NW Front Ave.	Tom Gahner	VCP	XPA	03/02/06	Stormwater	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PGE Substation E	3878	10.4	2835 NW Front Ave.	Tom Gahner	VCP	XPA	03/02/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PGE Substation E	3878	10.4	2835 NW Front Ave.	Tom Gahner	VCP	XPA	03/02/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Butte Pump	1235	10.4 W	2800 NW Front	Mark Pugh	PH Agr for XPA (6/02)	XPA	03/03/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	p Med	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Butte Pump	1235	10.4 W	2800 NW Front	Mark Pugh	PH Agr for XPA (6/02)	XPA	03/03/06	Bank Erosion	Ongoing	RP is conducting a SCE	SCE to be completed in fall 2006	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed, fall 2006									
Butte Pump	1235	10.4 W	2800 NW Front	Mark Pugh	PH Agr for XPA (6/02)	XPA	03/03/06	Groundwater	Ongoing	RP is conducting a SCE	SCE to be completed in fall 2006	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed, fall 2006									
Butte Pump	1235	10.4 W	2800 NW Front	Mark Pugh	PH Agr for XPA (6/02)	XPA	03/03/06	Stormwater	Ongoing	RP is conducting a SCE	SCE to be completed in fall 2006	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed, fall 2006									
Butte Pump	1238	10.4 W	2800 NW Front	Mark Pugh	PH Agr for XPA (6/02)	XPA	03/03/06	Overwater Activities	N/A	N/A	N/A	No known current sources (as reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Butte Pump	1235	10.4 W	2800 NW Front	Mark Pugh	PH Agr for XPA (6/02)	XPA	03/03/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Port of Portland Terminal 1 North	3377	10.8 W	2200 NW Front	Tom Gahner	PH Agr for RUSCM	RI	03/08/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Port of Portland Terminal 1 North	3377	10.8 W	2200 NW Front	Tom Gahner	PH Agr for RUSCM	RI	03/08/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Port of Portland Terminal 1 North	3377	10.8 W	2200 NW Front	Tom Gahner	PH Agr for RUSCM	RI	03/08/06	Groundwater	Ongoing	Complete GW Monitoring and evaluation	Complete RUSCM in Summer 2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed; 2006									
Port of Portland Terminal 1 North	3377	10.8 W	2200 NW Front	Tom Gahner	PH Agr for RUSCM	RI	03/08/06	Stormwater	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE to be completed; 2006									
Port of Portland Terminal 1 North	3377	10.8 W	2200 NW Front	Tom Gahner	PH Agr for RUSCM	RI	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Port of Portland Terminal 1 North	3377	10.8 W	2200 NW Front	Tom Gahner	PH Agr for RUSCM	RI	03/08/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

## 3/24/2008

T3

24 of 24

## JSCS

## Milestone Report

### 7.4.1 ID Potential Sources

- status

[Tables 1, 2, & 3] partial list  
[Table 4, columns 7, 8, 9, 10, 11, 12]

### 7.4.2 Table of confirmed sources

- basis for determination
- priority of the site

[Table 4]  
[column 13]  
[column 15]

### 7.4.3 Source Control Decision

- summary of SCE
- basis for SCE
- summary of control measures
- schedule for control measure implementation

[Table 4]  
[columns 13, 14, 15]  
[column 18]  
[columns 20, 22, 23]

### 7.4.4 Source Control Measure Status

7.4.5 ⇒

- completed activities w/Date
- proposed activities
- schedule
- est mass/vol removed/controlled

[columns 20, 23]  
[column 18]  
[column 22]  
[column 21]

7.4.5 ⇒

- EPA review/comment Date

[columns 16, 19, 24]

7.4.5 ⇒

- O&M requirements

[column 25]  
[section 6]

### 7.4.6 Issues

- proposed resolution
- schedule

### 7.4.7 SC schedule

- order by site priority
- site name
- priority rank
- contaminant pathway
- status of SC docs (SCE, SCD, design, impl. Rpt)
- target dates

[Table 4]



# Sites Adjacent to the River

Rm 2-3

## West

T2 Alder Creek Lumber Co., Inc.

## East

T2 Port of Portland (T5)

T2 Oregon Steel Mills - Rivergate

JR Simplot

Port of Portland

Ash Grove Cement Co.

Port of Portland (LSD Fort James)

T2 City of Portland (OF-53A)

Rm 3-4

West

- T2 Portland General Electric Co - Harborton Substation
- T1 Linnton Oil Fire Training Grounds
- T2 Georgia-Pacific - Linnton Fiber Terminal
- Morse Brothers Inc (ACF Industries? T2)
- T2 Owens Corning - Linnton

East

- Port of Portland (Fort James)
- Port of Portland
- Portland General Electric Co.
- T2 Time Oil Co.
- T3 Premier Edible Oils
- Schnitzer Investment Corp.
- Calbag Metals
- Portland Blast Media
- Schnitzer Steel
- T2 Jefferson Smurfit
- Northwest Pipe and Casing

Rm 4-5

West

- T2 Kinder Morgan Liquid Terminals (GATX)  
RK Storage & Warehousing  
Babcock Land Co.
- T2 Linnton Plywood Assn.  
Columbia River Sand & Gravel
- T1 ARCO Bulk Terminal (BP West Coast Products LLC)

East

- T2 Port of Portland (T4, slip 1)  
City of Portland  
Port of Portland (Kinder Morgan)
- T2 Union Pacific Railroad (St. Johns tank farm)
- T1 Port of Portland (T4, slip 3)  
Port of Portland (Oregon)  
Port of Portland (Toyota)
- T2 City of Portland (OF-52C)

RM 5-6

West

T1	Mobil Oil Terminal
	ST Services/Shore Terminal
T2	Foss Maritime /Brix Maritime
	Transloader International Co.
	Zung Jiahong
	General Construction
	Henderson Tow Boats
T2	Marine Finance Corp
T1	US ACDE - US Moorings

East

T2	Port of Portland (Toyota)
	Brix De Armond LLC
T2	MarCom Inc
	City of Portland BES Water Pollution Control Lab
T2	City of Portland (OF-52, OF-52A, OF-53)

RM 6-7

West

T1 US Moorings  
T1 Gasco (NW Natural Gas Co.)  
T4 Koppers Industries Inc  
T2 Walker Siltronics Corp  
T1 Archema (Atofina)  
T2 City of Portland (OF 22B, OF-22C)

East

T2 City of Portland BES WPC Lab  
Crawford Street Corp  
Metro  
T1 McCormick & Baxter  
T2 City of Portland (OF-49)

Rm 7-8

West

- T1 Archema (Atofina)
- T3 GS Roofing Products
- T1 GATX Terminals Corp
- T1 Port of Portland (Shell)
- T1 Kinder Morgan (Shell)
- T1 Port of Portland (Chevron)
- T1 Port of Portland (Tosco)
- T2 Port of Portland (McCall Oil & Great Western Chem)
- T2 City of Portland (OF-22)

East

- T1 McCormick & Baxter
- T1 Triangle Park
- University of Portland
- T2 City of Portland (OF 48)

RM 8-9

West

- T2 Port of Portland (McCall Oil & Great Western Chemical)  
Front Ave. LLP / Glacier NW  
Zidell - Tube Forgings
- T2 Front Ave LLP
- T2 Shower Transportation Co
- T2 Lakeside Industries
- Gunderson Inc
- Equilon Enterprises LLC
- T2 Texaco Portland Bulk Dock
- T4 Texaco Equilon Pipeline
- T2 City of Portland (OF-19, OF-19A, OF-18)

East

- T1 Portland Shipyard (Cascade General Ship Repair)
- Port of Portland
- T2 City of Portland (OFS-6)

Swan Island Lagoon

- T2 USCG Portland Station
- T2 Fred Divine Diving & Salvage Co
- Port of Portland
- T3 Freightliner Corp (Parts Mfg)
- City of Portland
- Island Holdings Inc
- Becker Trucking Inc
- Crosby & Overton
- Environmental Fibers Intl
- T2 City of Portland [OFS-7, OFS-2, OFM-3, OFM-2, OFM-1]

Rm 9-10

West

Gunderson Inc

Iryjoy 3rd Generation Corp

Sause Bros Inc

City of Portland

Cindy Williams

T3

Port of Portland (T2)

Port of Portland

T2

City of Portland (OF-16, OF-17)

East

Port of Portland

Port of Portland (Freightliner)

T2

City of Portland (OFS-5)



Rm 10-11

West

Port of Portland

Bingham Willamette Co.

T3

Sulzer Bingham Pumps

T3

Port of Portland (T1)

East

T3

Goldendale Aluminum

T3

Union Pacific Railroad - Albina Yard

Ashgrove Cement Co.

Port of Portland

Sakrete of Pacific Northwest

City of Portland (OF45)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

Reply To  
Attn Of: ECL-115

April 6, 2006

James M. Anderson  
DEQ Northwest Region  
Portland Harbor Section  
2020 SW Fourth Ave, Suite 400  
Portland, OR 97201

RE: Portland Harbor Joint Source Control Strategy Milestone Report – March 2006

Dear Mr. Anderson:

EPA has reviewed the March 2006 Milestone Report for Upland Source Control at the Portland Harbor Superfund Site submitted by DEQ on March 24, 2006. We can construe that DEQ has spent a lot of time and hard work in developing this report and appreciate the effort put into this document. We do, however, have many comments and concerns with the report. We have enclosed several questions and comments regarding the report (Enclosure 1) that we would like to discuss with DEQ. In some cases, we have provided suggested changes and have enclosed an example of those suggested changes (Enclosure 2).

We would like to set a meeting with you to discuss the contents of the enclosures. From our earlier telephone discussion this week, we will be setting that meeting at the April 12, 2006, Portland Harbor TCT meeting. We look forward to meeting with you.

Sincerely,

Kristine Koch  
Remedial Project Manager  
U.S. Environmental Protection Agency

encls.

**Enclosure 1**  
**EPA Comments on the**  
**Portland Harbor Joint Source Control Strategy Milestone Report – March 2006**

---

**General**

Comments: Much of the explanation of how sources are identified is in the JSCS, why is it rewritten in the Milestone Report?

**Section 2.0**

Comments: Why is a detailed discussion about when the sources were identified in relation to the NPL listing in this Report? Why is it relevant to reporting on how the JSCS is being implemented? Is there a substantive difference in how the JSCS is being applied to a facility due to the timeframe the source was identified? If so, what is the substantive difference?

Comments: Section 2.1, page 5 states that the NPL listing "curtailed" the strategy recommendations for potential sources, but in Section 2.2. it is stated that DEQ's site discovery and assessment work continued after the listing. These statements are inconsistent. Again, why is this discussion in the Report if it is not substantively relevant to how the JSCS is being implemented? If it is relevant to how the JSCS is being implemented, please explain.

**Section 3.0**

Comments: Page 5-6, **Direct discharges**: Are there any POTW discharges within the ISA? POTWs can be potential sources when industrial users discharge waste water and storm water to the POTW and the pollutants are not regulated adequately.

**Section 6.0**

*These comments are tied to Section 7.4.6 of the PH JSCS. "DEQ will identify issues affecting the ability to make source control decisions or completeness determinations, for any step of the source control process (i.e., identification, characterization, and implementation). In addition, DEQ will propose ways to resolve issues and a desired timeframe for resolution."*

Comments: Page 9, **Issue 1**: Why are these six facilities singled out as needed accelerated schedules for source control work? Are they unwilling to work with DEQ in controlling sources? The milestone report is not clear on why these facilities are an issue for source control; it just states "For a number of different reasons..."

What part of the source control process is there an issue? Is their a particular pathway that is problematic?

**Enclosure 1**  
**EPA Comments on the**  
**Portland Harbor Joint Source Control Strategy Milestone Report – March 2006**

---

The resolution was for "...DEQ... to first identify the sites then accelerate their schedule for source control work." This (to first identify) sound like DEQ needs to identify sites with potential sources, which has already been done. If the intent of DEQ was to state that the sites that are not progressing at an acceptable pace need to be identified by DEQ, it was not portrayed in this sentence. The second resolution (accelerate their schedule for source control work) seems to imply that the problem is with DEQ PM's schedule management. Is this true?

Additionally, a timeframe was not provided for resolving this issue other than "DEQ will report on efforts to accelerate source control work at these sites in the next Milestone Report (June 2006)." Does this mean that DEQ plans to resolve this issue for these sites by June 2006?

**Suggested changes:** DEQ should strike first sentence from the second paragraph.

Provide the issue(s) for each facility in a sub-issue (e.g., Issue 1a: Premier Edible Oil). Briefly state the issue(s) for the site, including the pathway(s) and process(s) that are problematic. Present the proposed resolution(s) for dealing with issue (this may be a process including meetings, letters, orders, schedule modifications, etc.). Finally, DEQ needs to provide a timeframe for resolving the issue with the facility (e.g., June 2006). DEQ should report on the status of each issue in subsequent milestone reports.

**Comments:** Page 10, **Issue 2:** Why is Gasco separated from the facilities in Issue 1? The milestone report is not clear on why the Gasco facility is an issue for source control. This issue/resolution implies that the problem is with DEQ PM's schedule management (second sentence in second paragraph) and the fact that Gasco is still collecting information when they were listed by DEQ as an active site in 1999. Is the problem really with DEQ management or with data collection or something else? There is no timeframe proposed for resolving this issue.

**Suggested changes:** Briefly state the issue(s) for the site, including the pathway(s) and process(s) that are problematic. Present the proposed resolution(s) for dealing with issue (this may be a process including meetings, letters, orders, schedule modifications, etc.). Finally, DEQ needs to provide a timeframe for resolving the issue with the facility (e.g., June 2006). DEQ should report on the status of each issue in subsequent milestone reports.

**Tables**

*These comments are tied to Section 7.4.1 of the PH JSCS. "DEQ is evaluating and identifying potential upland sources of contamination to Portland Harbor to determine if further investigation or source control measures are required. DEQ will present a table*

**Enclosure 1**  
**EPA Comments on the**  
**Portland Harbor Joint Source Control Strategy Milestone Report – March 2006**

---

*of potential upland sources identified through upland site discovery activities (see Appendix B for more information) and the status of their review."*

Comments: It appears that Tables 1, 2 and 3 provide the list of sites that are potential upland sources. It is unclear why DEQ chose to provide this information in three tables rather than one, as described in the PH JSCS, other than to point out the timing of discovery. This could have been done in one table. It is also unclear why DEQ did not include all properties adjacent to the Willamette River as potential upland sources for at least the storm water pathway. Did DEQ use the JSCS screening values in prioritizing all identified facilities in all of the tables?

Comments: **Table 1:** Why is the information in Table 1 different from Tables 2 and 3? Why aren't Time Oil and ARCO listed in Table 4? The information (project management input and DEQ Follow-Up) in Table 1 is not necessary for the milestone report and some of the information in seems out of date and may misrepresent the upland source.

Comments: **Table 2:** Why aren't Alder Creek Lumber, Babcock Land Company, LLC, City of Portland Water Pollution Lab, Columbia Sand & Gravel, Hampton Lumber Sales/CMI NW, Hendren Tow Boats, RK Storage, Santa Fe Pacific Pipeline, and Transloader International (General Construction Company) listed in Table 4?

Comments: **Tables 2 & 3:** EPA does not understand DEQ's priority scheme in these tables. Only PA, XPA, and RI are listed as high priority giving the impression that DEQ is still investigating all these sites and has not conducted any source control measures at these sites. It also gives the impression that DEQ has not listed any sites as high priority because high-priority sites are expected to move forward with aggressive source control measures and these sites are still in the investigation phase.

Comments: **Table 4:** Why aren't Esco Landfill Sauvie Island, Gasco/Siltronic, Koppers Inc., Texaco Product Pipeline, and Vanwater and Rogers listed in Tables 1, 2 or 3? Why are there listings for Gasco, Siltronic, and Gasco/Siltronic? What are the differences between these sites? Facilities in Table 4 have different names than those in Tables 1, 2 or 3, which makes it difficult to compare tables. Information in column 7 does not reflect current status from other information in table. Why is the information in column 6 important for the Milestone Report? The City of Portland outfalls are only storm water conveyance system rather than a site: no need to list other pathways. The City of Portland has many outfalls with different activities and priorities at each one. The table should list each outfall as pathway and then describe SCE/SCD for each one. Why are headings in Table 4 different from the PH JSCS?

**Enclosure 1**  
**EPA Comments on the**  
**Portland Harbor Joint Source Control Strategy Milestone Report – March 2006**

---

Comment: Site names in Tables 1, 2 and 3 do not match those in Table 4.

Suggested changes: DEQ should provide one table that is a comprehensive list all sites that have been considered, historically or currently, a potential upland source to the Willamette River, including those sites that DEQ has already determined are not a source through their investigation process. This will show that DEQ has considered all sources of contamination to the Superfund Site. Information in this table should be limited to site identification (e.g., site name [common, legal, and former, as applicable], site address, ESCI #, river mile, etc.) (Tables 2 & 3, columns 1 & 2; Table 4, columns 1, 2, 3 & 4), name of DEQ PM (Table 4, column 5), contamination migration pathways (Table 4, column 9), project status for each pathway (e.g., not started, PA, XPA, RI, completed) (Table 4, column 7), major SCE tasks to be completed for each pathway (Table 4, column 11), and expected SCE completion date (month and year) or completion date if project status is completed (Table 4, column 12?).

*These comments are tied to Section 7.4.2 of the PH JSCS. "Preliminary investigation activities at upland sites are designed to determine if a site is an ongoing source of contamination to the river. Sites that are identified as current or potential sources will be characterized and prioritized, and then may require either initiation of source control measures or further evaluation to determine if source control measures are required. DEQ will present a table of confirmed sources of contamination to the river, the basis for that determination, and the priority of the site for source control. High-priority sites will be identified in the initial Milestone Report based on existing site information, and subsequent Milestone Reports will identify any new high-priority sites as new information becomes available. Source control is expected to move forward at high-priority sites without delay."*

Comments: Table 4 did not specifically provide the basis for the determination of confirmed sources; it was included in Column 13 **Pathway determination**. A confirmed source is one that has a potential or complete contaminant migration pathway to the Willamette River and has contaminants of interest to the Portland Harbor Superfund Site. DEQ only provided whether the pathway was complete, insignificant, or incomplete; there was no information on contaminants. The term 'insignificant' should not need to be used since there is no definition provided. It would be better to provide a basis that contaminants of interest are not a concern (e.g., contaminants within 1 order of magnitude of SLV, contaminants comply with NPDES permit limits, etc.) and rank the pathway as low priority (Table 4, column 14).

Comments: The JSCS provided that the priority scheme would result from comparing data from each media to the JSCS SLVs and, along with other information

**Enclosure 1**  
**EPA Comments on the**  
**Portland Harbor Joint Source Control Strategy Milestone Report – March 2006**

---

known, a high, medium, or low priority would be given to each identified source. High priority sources would be facilities that needed to move to source control action and stop further investigations and assessment. This scheme does not appear to be applied in the Tables.

Suggested changes: DEQ should provide one table that is a comprehensive list all sites that have been identified as a confirmed upland source to the Willamette River. This table should include the site name (same name as used in potential upland sources table), basis for the determination that this is a confirmed source (e.g., storm water - complete pathway for copper, phthalates, and PCBs), and site priority (Table 4, column 15). DEQ may include this information in the same table as the potential upland sources. Additionally DEQ may provide the determination for why a particular pathway is not a confirmed source (e.g., Overland transport/sheet flow - incomplete pathway: berm prevents overland pathway) and priority level for each pathway (Table 4, column 14).

*These comments are tied to Section 7.4.3 of the PH JSCS. "Source control decisions conducted at upland sites will [be] briefly summarized. The Milestone Reports will include a summary of the source control evaluation, the basis for determination that upland source control measures are necessary, a summary of the selected source control measure, and a schedule for implementation of the source control measure. DEQ will present a table of the source control decisions for each contaminant migration pathway for confirmed or potential sources of contamination to the river."*

Comments: A summary of the source control evaluation was not provided other than the source was complete, insignificant, or incomplete. This is not enough information about the source control evaluation to identify a confirmed source (See comments for Section 7.4.2.). The basis for upland source control measures was not adequately provided in Table 4 (columns 13, 14 and 15). Examples of adequate basis would be: contaminants 2 or more order(s) of magnitude above SLV; contaminants exceed NPDES permit limits; etc. Not all SCMs are provided in Table 4, column 18 (e.g., Paving at Calbag Metals for storm water). A schedule for implementation of each SCM is not provided in Table 4: column 20 provides the completion date (month, year) for each SCM, although not all entries provide a date; column 22 provides a schedule for SCM, although only limited or no schedule information is provided (a schedule consists of more than just a SCM due date – See additional comments on Section 7.4.4); and column 23 provides the date SCM is complete, which is the same information provided in column 20. The columns in Table 4 do not progress in logical order in the source control process which makes it difficult to determine where DEQ is in the source control process.

**Enclosure 1**  
**EPA Comments on the**  
**Portland Harbor Joint Source Control Strategy Milestone Report – March 2006**

---

Comments: Section 9.0, page 15, second paragraph, indicates that sites that have completed upland source control are shaded. These sites were all given priority of low or medium. Why did DEQ chose to proceed on these sites when there are other high-priority sites that are still being evaluated? If these sites were high priority for source control and are now low priority because of DEQ source control efforts, then they should be identified as high priority sites, but DEQ could add another column for post-SCD site priority where they can indicate that the site is now low priority. For some pathways at some sites, DEQ indicated "no SCM necessary" in Table 4, column 18, without providing any explanation for this. Why do some entries have "N/A" and others state "no SCM necessary?" What is the difference?

Suggested changes: Make suggested changes for Section 7.4.2. Include list of contaminants evaluated and basis for upland source control measures. Make sure all SCMs implemented for each pathway at each site are included in Table 4, column 18. Be consistent in entering information. Provide a schedule with milestones (proposed activities and estimated completion dates) for all SCMs, including those that have been completed. DEQ should add a column for SCD where it is indicated either "SCM needed" or "no SCM needed." Table should progress in order of source control process.

*These comments are tied to Section 7.4.4 of the PH JSCS. "For ongoing source control measures, a summary of their status will be provided in the Milestone Reports. The status report will summarize **activities completed to date, proposed activities, and a target schedule for completion.** To the extent practical, DEQ will collect information and/or make **estimates of the mass or volume of contaminants removed, contained, treated or otherwise controlled, in order to help communicate to stakeholders on the progress of source control activities.**"*

Comments: See comments for Section 7.4.3 regarding SCM schedule. Why hasn't DEQ provided mass or volume of contaminants removed, contained, treated or otherwise controlled when SCM complete? To help in evaluating whether the source control being taken will be effective or consistent with the Harbor cleanup, the performance standards, e.g., cleanup levels, that DEQ set in each media needs to be provided for each completed source control measure.

Suggested changes: Make suggested changes for Section 7.4.3. Provide mass or volume of contaminants removed, contained, treated or otherwise controlled for completed SCMs. Include clean-up levels for completed activities.

*\* These comments are tied to Section 7.4.5 of the PH JSCS. "A summary of **complete source control measures** will be provided in the Milestone Reports. The status report*



**Enclosure 1**  
**EPA Comments on the**  
**Portland Harbor Joint Source Control Strategy Milestone Report – March 2006**

---

*will provide a description of the source control measure, the date the source control measures was complete, the date of EPA review and comment, and any operation and maintenance requirements."*

Comments: See comments for Sections 7.4.3 and 7.4.4 regarding completed source control measures. DEQ has provided three places for EPA review and comment in the process: (1) review of SCE; (2) review of SCM selection; and (3) review of completed SCM. Make sure that the data in these columns is correct (e.g., there are places where the information for SCE review is in the SCM evaluation column). Information in these columns can be minimized (e.g., waiting on SCE, submitted 10/2004 no comments received, submitted 10/2004 comments received 11/2004, etc.)

\* *These comments are tied to Section 7.4.7 of the PH JSCS. "DEQ will provide the source control schedule and quarterly updates to the schedule (See Section 6.0) in order of site priority. The schedule will list the site name, priority, known contaminant migration pathways, status of source control documents (i.e., Source Control Evaluation, Source Control Decision, Source Control Design, and Implementation Report). Target dates that have changes will be listed and an explanation for the change will be reported."*

Comments: See comments for Sections 7.4.1 through 7.4.5. Why didn't DEQ put these in order of site priority? Is Table 4, column 17 (Source control alternative evaluation and schedule) the same as Source Control Design? Why isn't there a column for the Implementation Report? Will EPA get to review this document as allowed in the PH JSCS Section 7.3? Is this the purpose for Table 4, column 24?

Suggested changes: The facilities should be listed by priority so that all high priority facilities would be listed first (maybe in a different color), medium second, and low last. The headings in the table should match those in the PH JSCS.

**Enclosure 2**  
**Example Milestone Report**  
**Table 1. Source Control Evaluation/Decision**

Site Identification					Source Control Evaluation					Source Control Decision					
Site Name	ESCI #	River Mile	Address	DEQ PM	Potential Contaminant Migration Pathway	Project Status	Major SCE Tasks	Contaminants Evaluated	SCE Completion Date (m-y)	Confirmed Source (y/n)	Basis for Confirmed Source	Need Source Control (y/n)	Pathway Priority	Site Priority	EPA Review Status
Company A	1234	0.0	123 Location Way	Mr. Clean	Overland Transport/ Sheet Flow	completed			March 2005	no	incomplete pathway; berm prevents overland transport	no	NS	TBD	Waiting on SCE
					Bank Erosion	completed			March 2005	no	incomplete pathway; concrete bulkhead along shoreline	no	NS		
					Groundwater	XPA	Conduct well monitoring; review SCE	BETX, PAHs, PCBs, DDD, DDE, DDT	June 2006						
					Storm Water	not started	Characterization of conveyance system; develop monitoring plan; catch basin/in-line clean out; sample removed solids; in-line monitoring; review SCE	Cu, Pb, Zn, TPH, phthalates, SVOCs	June 2006						
					Overwater Activities	completed			March 2005	no	incomplete pathway; no overwater activities at site	no	NS		
					Other	completed			March 2005	no	incomplete pathway; no other pathways identified at site	no	NS		
Company B	4321	0.0	234 Location Way	Mr. Clean	Overland Transport/ Sheet Flow	completed			March 2005	no	incomplete pathway; all surface routed to storm water conveyance system	no	NS	High	Submitted 7/2005; no comments rec'd
					Bank Erosion	completed			March 2005	no	incomplete pathway; concrete bulkhead along shoreline	no	NS		
					Groundwater	completed		TPH, PAHs, PCBs, chlorinated pesticides	June 2005	yes	complete pathway; NAPL plume	yes	High		
					Storm Water	completed		Cu, Zn, phthalates, PCBs	June 2005	yes	complete pathway; outfall 1-Cu, phthalates, outfall 2-PCBs	yes	Medium		
					Overwater Activities	completed			March 2005	no	incomplete pathway; no overwater activities at site	no	NS		
					Other	completed			March 2005	no	incomplete pathway; no other pathways identified at site	no	NS		

**Enclosure 2**  
**Example Milestone Report**  
**Table 2. Source Control Implementation**

Site Identification						Source Control Implementation							
Site Name	ESCI #	River Mile	Address	DEQ PM	Site Priority	Contaminant Migration Pathway	Contaminants of Concern	Clean-up Levels	Selected SCMs	Completed SCM(s) (m-y)	Mass/Volume Removed/Controlled	O & M Requirements	EPA Review Status
Company B	4321	0.0	234 Location Way	Mr. Clean	High	Groundwater	TCE	TCE = 0.005 ppm	Pump & Treat Install Sheet Pile Wall	March 2006	500 gallons		
						Storm Water	Cu, PCBs	Cu = 10 ppm PCBs = 0.7 ppm phthalates = 0.8 ppm	Clean out system	October 2005	3 tons	Inspect and monitor conveyance system annually; Clean out system at least every 5 years	Submitted 01/2006; rec'd comments 02/2006
									Install Berms	October 2005	1 ton/year	Inspect monthly during storm season; Clean area regularly to remove debris	Submitted 01/2006; rec'd comments 02/2006

**Enclosure 2**  
**Example Milestone Report**  
**Table 3. Source Control Schedule**

Site Identification						Source Control Schedule													
Site Name	ESCI #	River Mile	Address	DEQ PM	Site Priority	Contaminant Migration Pathway	Source Control Evaluation				Source Control Design				Source Control Implementation				
							PA (m-y)	XPA (m-y)	RI (m-y)	SCE Report (m-y)	DEQ Review (m-y)	DEQ SCD (m-y)	EPA Review (m-y)	SCMs Alternatives Evaluation (m-y)	DEQ Select SCMs (m-y)	EPA Review (m-y)	Complete SCMs (m-y)	DEQ Report (m-y)	EPA Review (m-y)
Company B	4321	0.0	234 Location Way	Mr. Clean	High	Overland Transport/ Sheet Flow	August 2004			November 2004	December 2004	March 2005	July 2005						
						Bank Erosion	August 2004			November 2004	December 2004	March 2005	July 2005						
						Groundwater	August 2004	November 2004		February 2005	March 2005	June 2005	July 2005	November 2005	December 2005	January 2006	April 2007	July 2007	August 2007
						Storm Water	August 2004	November 2004		February 2005	March 2005	June 2005	July 2005	August 2005	September 2005	October 2005	December 2005	January 2006	
						Overwater Activities	August 2004			November 2004	December 2004	March 2005	July 2005						
						Other	August 2004			November 2004	December 2004	March 2005	July 2005						
Company A	1234	0.0	123 Location Way	Mr. Clean	TBD	Overland Transport/ Sheet Flow	August 2004			November 2004	December 2004	March 2005	July 2006						
						Bank Erosion	August 2004			November 2004	December 2004	March 2005	July 2006						
						Groundwater	August 2004	November 2005		February 2006	March 2006	June 2006	July 2006	October 2006	November 2006	December 2006	December 2007	March 2008	April 2008
						Storm Water	August 2004	November 2005		February 2006	March 2006	June 2006	July 2006	October 2006	November 2006	December 2006	May 2007	August 2007	September 2007
						Overwater Activities	August 2004			November 2004	December 2004	March 2005	July 2006						
						Other	August 2004			November 2004	December 2004	March 2005	July 2006						

# DEQ Milestone Report

## Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

 = Shading indicates that upland source control work has been completed.

Confirmed or suspected Sources of contamination to the river					Source Control Evaluation (SCE)										Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs)									
Site information															Project status									
Site name	ECSI #	River mile	Address	DEQ PM	Type of agreement directing source	Project status	Date last modified (m-d-y)	Potential contaminant migration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determination that source control is needed			Status of EPA review of SCE decision	Source control alternatives evaluation and schedule (m-v)	Selected SCMs	Status of EPA review of SCM selection decision	SCM activities completed to date (m-v)	Mass or volume of contaminants controlled	Proposed SCM activities to be done and schedule (m-v)	Date SCM completed (m-v)	Status of EPA review of completed SCM	Operation and maintenance requirements
												Pathway determination	Pathway priority level	Site priority level										
Terminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	to be determined	Waiting on SCE to be completed. 2006									
Terminal 5	1688	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Bank Erosion	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE to be completed. 2006									
Terminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Groundwater	Ongoing	Coordinate with Oregon Steel Mills monitoring	2006	Waiting on SCE to be completed.	to be determined		Waiting on SCE to be completed. 2006									
Terminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Stormwater	Ongoing		2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed. 2006									
Terminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Terminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	no pathway; berm prevents overland transport/sheet flow	None	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Bank Erosion	Ongoing	Interpretation of sampling data	April 2006	Pathway is complete	p High		Waiting on SCE to be completed. 2006									
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Groundwater (UST & AST AOCs)	Completed			Insignificant pathway; no actions recommended	Low		SCE submitted to EPA 10/2004; no comments received	Soil removal completed at time of spill, prior to SCE						SCE submitted to EPA 10/2004; no comments received		
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Groundwater (other AOCs)	Ongoing	Interpretation of sampling data	December 2006	to be determined	to be determined		Waiting on SCE to be completed									
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Stormwater	Ongoing	Further investigation of stormsewer system	December 2006	Pathway is complete	p High		Waiting on SCE to be completed. 2006									
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oregon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Other - current NPDES permitted discharge	Not Started	To be determined	No current schedule	Waiting on SCE to be completed			Waiting on SCE to be completed									
Esco Landfill Sauvie Island	4409	2.6	14444 NW Gillihan Loop	Mark Reeves	Industrial landfill disposal permit	PA	03/20/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Esco Landfill Sauvie Island	4409	2.6	14444 NW Gillihan Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/06	Bank Erosion	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Esco Landfill Sauvie Island	4409	2.6	14444 NW Gillihan Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/06	Groundwater	Ongoing	groundwater monitoring ongoing	2007	Waiting on SCE to be completed	to be determined		Waiting on SCE completion, 2007									
Esco Landfill Sauvie Island	4409	2.6	14444 NW Gillihan Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/06	Stormwater	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Esco Landfill Sauvie Island	4409	2.6	14444 NW Gillihan Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/06	Overwater Activities	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Esco Landfill Sauvie Island	4409	2.6	14444 NW Gillihan Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/06	Other	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Consolidated Metco	3295	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	P Low	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Consolidated Metco	3295	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

## DEQ Source Control Milestone Report Objectives

- Site discovery summary and strategy
- Establish a schedule for source control milestones
  - Determination of whether an upland site is a current source of contamination to the river and sediments
  - Selection of source control measure
  - Determination that a source control measure has been satisfactorily performed.
- Track progress of upland source control
- Key information
  - Source identification
  - ID site priority (e.g., high priority sites)
  - Source control measures implemented
  - Status of ongoing source control measures
  - Completed source control measures
  - Source reduction estimates
- Source Control Decisions
  - Table identifying source control decisions for each contaminant pathway at each individual site.
  - Schedule for implementation
- Status of Ongoing Source Control Measures
  - Activities completed to date
  - Proposed activities
  - Schedule for implementation
- Completed Source Control Measures
  - Summary of completed measures
  - Date measure was completed
  - Date of EPA review and comment
  - ID operation and maintenance requirements